



DIGITAL FORUM ON THE USE OF DATA FROM THE AUTOMATIC EXCHANGE OF INFORMATION (AEOI)

OPERATIONAL IMPLEMENTATION OF CRS 2.0

26.11.2025



OVERVIEW

1. General context

- The Belgian CRS Experience
- Belgium's commitment to implement CRS 2.0

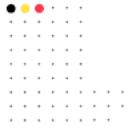
2. Legal implementation

3. Operational Implementation

- Scope
- How?

4. Challenges

5. Questions



1. GENERAL CONTEXT

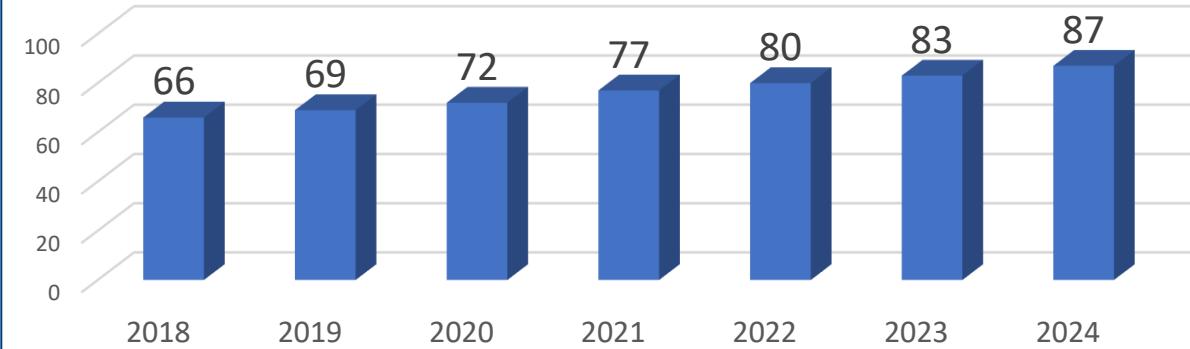


GENERAL CONTEXT: The Belgian CRS Experience

- Belgium began exchanging AEOI CRS information in 2018 and has met its commitment annually since then.
- Exchanges take place under:
 - MAC + MCAA
 - EU DAC2
 - EUSA
- Belgium undertakes to exchange CRS information with all jurisdictions that implement the CRS Standard



Exchange Partners (Outgoing Flow)



GENERAL CONTEXT: BELGIUM'S COMMITMENT TO IMPLEMENT CRS 2.0



- Belgium actively participated in international working group discussions during the drafting of CRS 2.0
- 26.11.2024: Signatory of the Addendum to the Multilateral Competent Authority Agreement on the Automatic Exchange of Financial Account Information (Addendum to the CRS-MCAA)
- [Council Directive \(EU\) 2023/2226](#)





2. LEGAL IMPLEMENTATION



LEGAL IMPLEMENTATION - OVERVIEW

Legal Framework





3. OPERATIONAL IMPLEMENTATION

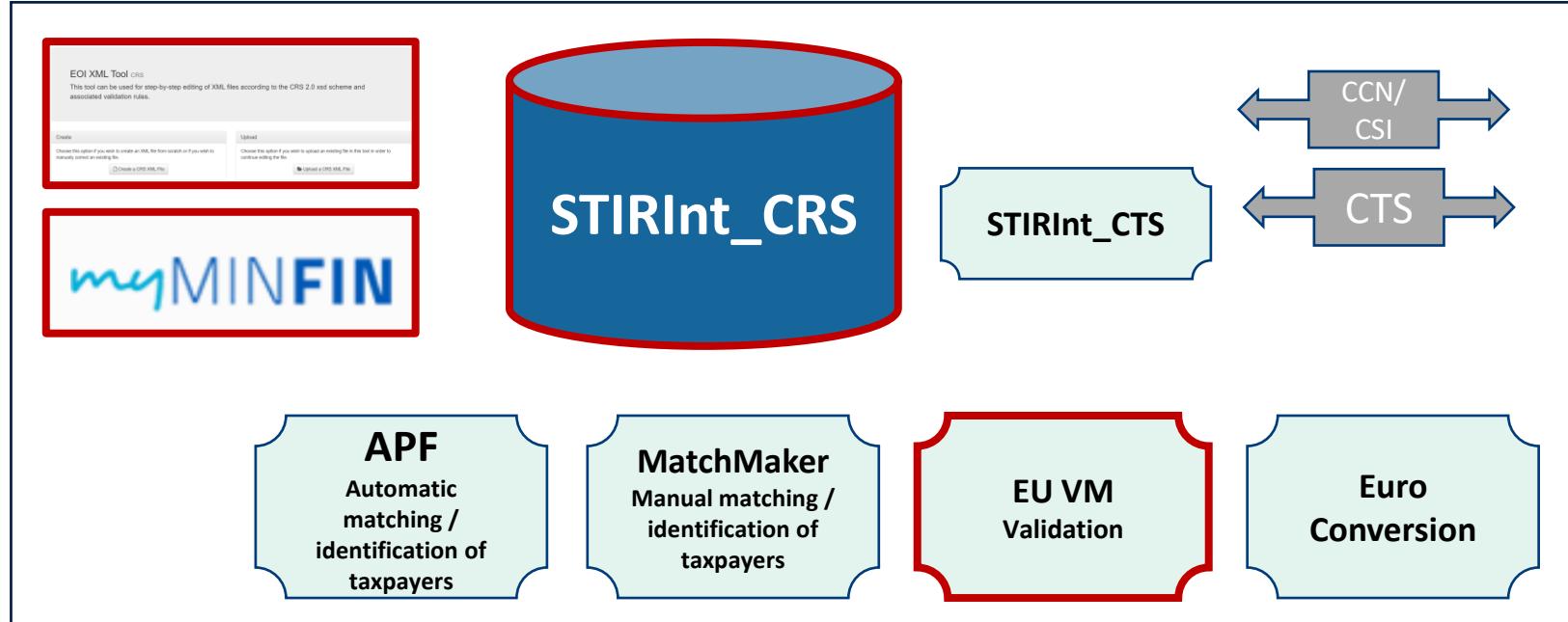
OPERATIONAL IMPLEMENTATION: SCOPE

Identification
of
modifications

- **IT Products**
 - CRS XSD Schema 3.0 + Status message
 - IT Tools for National reporting
 - Reporting Portal
 - CRS XML Tool
 - IT Tools for international exchange of information (Incoming and Outgoing Flow)
 - Mechanisms to make the received information available (in a readable format) to officials authorized to use the information received
- **Non IT Products**
 - Operational guidance
 - Communication
 - Operational process



OPERATIONAL IMPLEMENTATION : SCOPE – IT INFRASTRUCTURE



National Flow:

- Reception FI's Information
- Validation

Outgoing Flow:

- Grouping by Jurisdiction
- Validation
- Sending

Incoming Flow :

- Reception
- Validation
- Unpack
- Conversion €
- Identification
- Availability

OPERATIONAL IMPLEMENTATION : SCOPE – NATIONAL REPORTING TOOLS

Reporting Financial
Institutions

Reporting
tools

- **CRS Schema**
- **Validation Rules**

**XML
Schema**

TEST

- Simulation
Portal
- Mirror of the
production
environment

Reporting
Tool

**XML
Tool**

- National Portal
- **Validation**
- ACK/Error
Report

- Online tool
- **Based on the
XML Schema**
- **Incorporated
Validation**

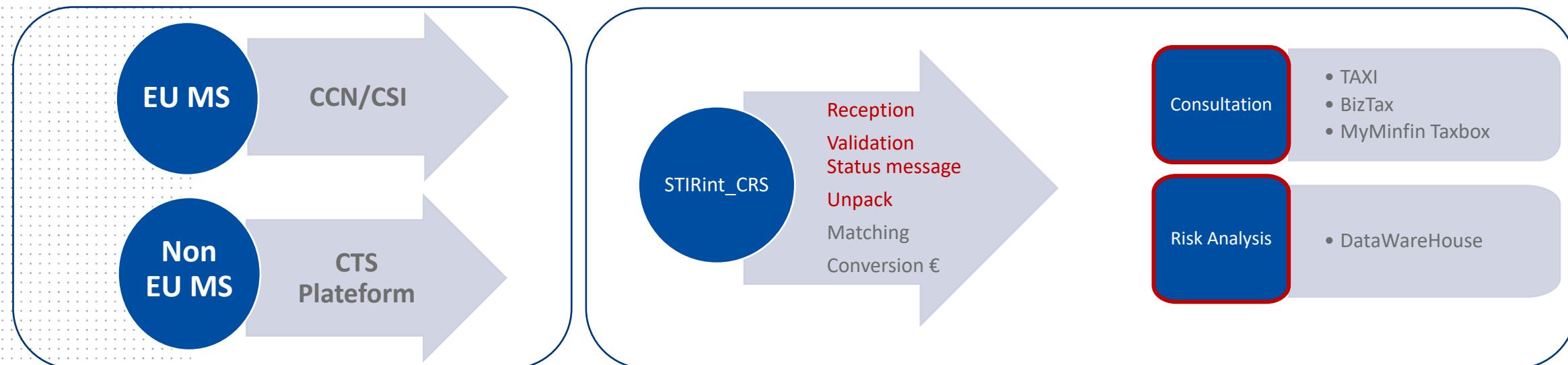


OPERATIONAL IMPLEMENTATION : SCOPE – AEOI IN TOOLS

Partner Jurisdictions

SPF Finances

Confidentiality & DataSafeGuard



Belgian process to incoming CRS data from abroad - A process in 4 major steps

Receipt

Validation

Identification

Making the
information available

OPERATIONAL IMPLEMENTATION : SCOPE – AEOI OUT TOOLS

National Reporting

FPS Finance

Partner Jurisdictions

Confidentiality & DataSafeGuard

National
Reporting

RFI

MyMinfin

Validation
ACK/ Error
report

Belgian
Competent
Authority

Per Jurisdiction
CRS XML
Schema
Validation

CCN/CSI

EU MS

CTS
Plateform

Non
EU MS

OPERATIONAL IMPLEMENTATION : NON-IT PRODUCT



Belgian Guidance notes

Examples of self-certification

Operational publications

Professional associations
(Febelfin -
Assuralia -
BEAMA)

Belgian financial institutions

Staff within the competent authority

Officials authorized to use the information received

PUBLIC SERVICE



Website of the FPS Finance (E-services CRS)

Information and documentation have been published by the Belgian Tax Administration on a dedicated web page to help FIs understand their obligations in implementing the CRS

- Latest news
- Publication
- Documentation
- Contact details

COMMON REPORTING STANDARD (CRS)

En 2013, dans un contexte de transparence fiscale, le G20 montre un intérêt accrus pour la mise en place d'une norme mondiale relative à l'échange automatique de renseignements financiers. Le G20 demande alors formellement à l'OCDE d'élaborer une norme commune de déclaration (Common Reporting Standard - CRS).

La Belgique s'est engagée, tout comme 100 autres juridictions, à échanger les renseignements CRS dès 2017. Les institutions financières belges sont dès lors tenues de transmettre au SPF Finances les renseignements financiers pertinents qui seront ensuite communiqués par la Belgique aux Etats partenaires.

[Plus d'informations](#)

Actualités

• [15.07.2024 - Rapportage CRS pour l'année calendrier 2023 : Prolongation complémentaire de la période de déclaration](#)

La période de déclaration relative à l'année calendrier 2023 est prolongée jusqu'au 31 juillet 2024 suite à la publication de l'arrêté royal du 1er juillet 2024 établissant la nouvelle liste des autres juridictions soumises à déclaration et la liste des juridictions partenaires (voir actualité du 8 juillet 2024).

Cette tolérance administrative s'applique uniquement aux rapports relatifs à l'année calendrier 2023 et ne peut être considérée comme un précédent.

➤ [QU'EST-CE QUE LE CRS ?](#)

➤ [COMMENT CRÉER DES FICHIERS XML CRS ?](#)

➤ [COMMENT ENVOIER DES FICHIERS XML CRS ?](#)

➤ [FAQ ET DOCUMENTATION](#)

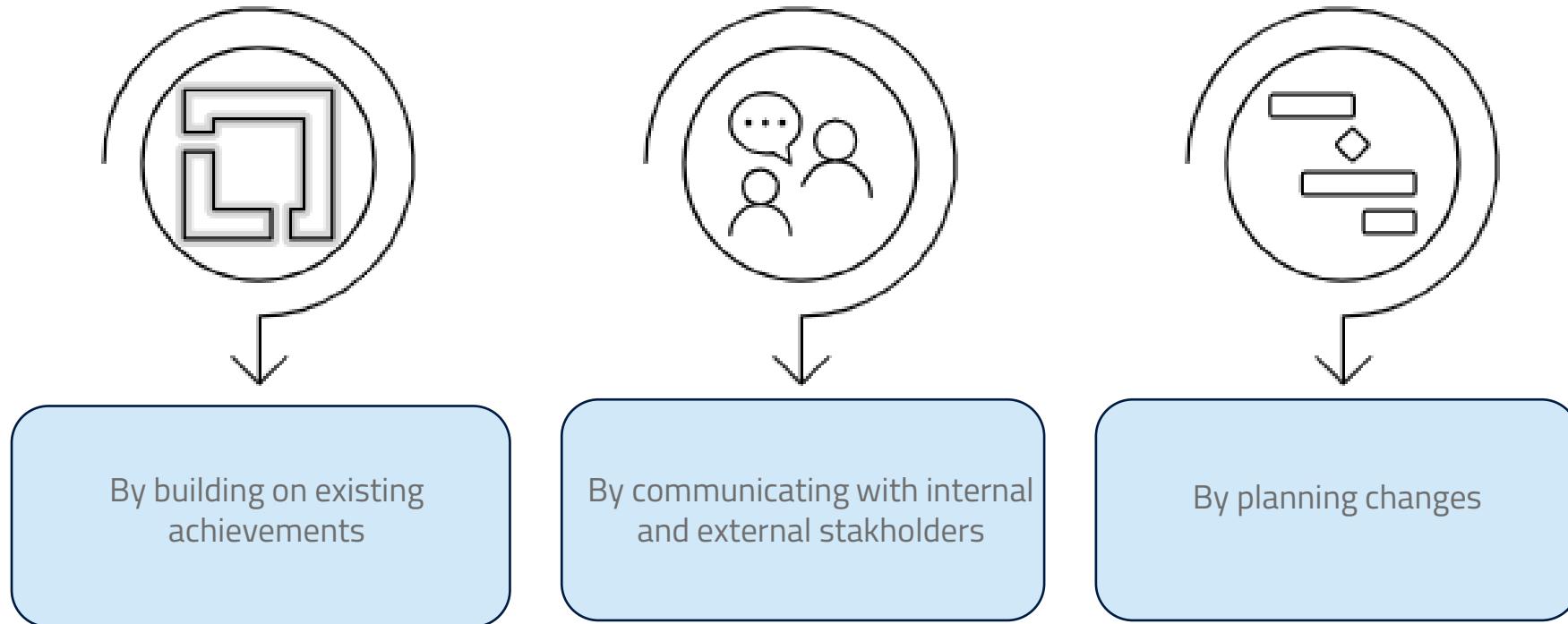
➤ [CONTACT](#)

Operational Processes
Internal guidance

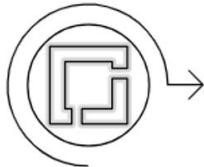




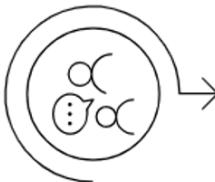
OPERATIONAL IMPLEMENTATION : HOW?



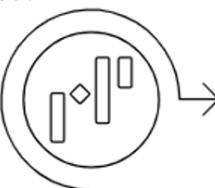
OPERATIONAL IMPLEMENTATION : HOW? – IT PRODUCTS



Experience gained during the implementation of version 2 of the CRS XSD schema (2021)

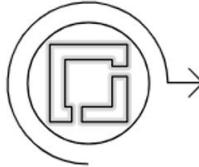


Presentation to internal stakeholders to secure the necessary human and IT resources

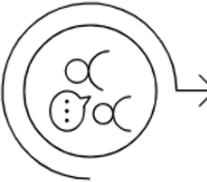


Overall planning and regular meetings with technical teams to coordinate implementation and schedule changes

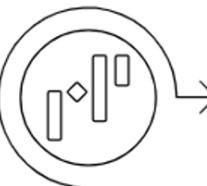
OPERATIONAL IMPLEMENTATION : HOW? – NON-IT PRODUCTS



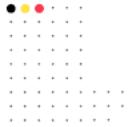
Reactivation of the working groups established with financial institutions during the initial implementation of CRS and during the implementation of version 2 of the CRS XSD schema



Presentation to external stakeholders
Update of our CRS e-services page



Scheduling the cut-off date for the transition to the new XSD schema



4. CHALLENGES

CHALLENGES



- For Tax administration
 - Coordination of all stakeholders
 - Alignment of technical changes with other ongoing projects related to international exchange of information
 - Ensure « uninterrupted » international exchange
- For Financial Institution
 - Implementation of the new requirements (cost, technical adjustments, ...)
 - Acquisition and validation of the TIN



5. QUESTIONS





THANK YOU FOR YOUR ATTENTION !

Céline Lepage - Advisor
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International Relations – Team Administrative cooperation DT

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