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# 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



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# 1. GENERAL CONTEXT

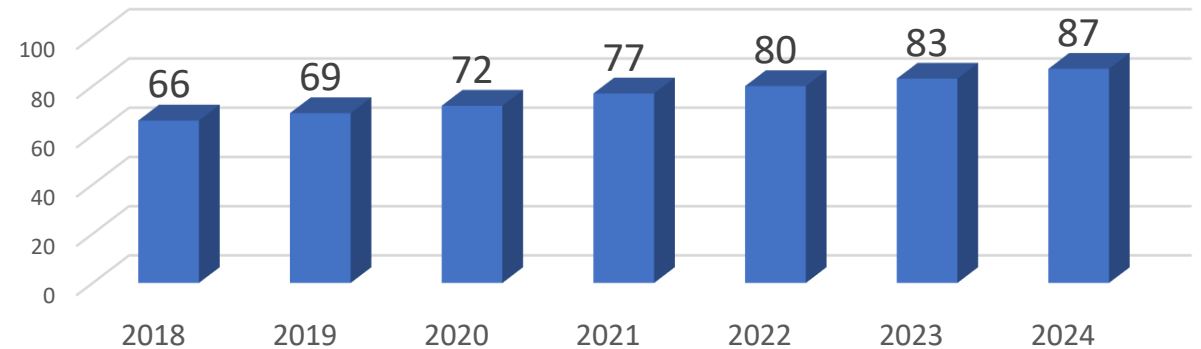


## GENERAL CONTEXT: The Belgian CRS Experience

- 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](#)





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## 2. LEGAL IMPLEMENTATION



# LEGAL IMPLEMENTATION - OVERVIEW

## Legal Framework

Convention on Mutual  
Administrative  
Assistance in Tax  
Matters (MAC)

Multilateral Competent  
Authority Agreement on  
Automatic Exchange of  
Financial Account Information  
(MCAA CRS)  
+  
Addendum  
+  
Notification under the MCAA

COUNCIL DIRECTIVE  
2023/2226 of 17  
October 2023  
amending Directive  
2011/16/EU on  
administrative  
cooperation in the field  
of Taxation

Agreements on  
exchange of financial  
account information  
with Andorra,  
Liechtenstein, Monaco,  
San Marino and  
Switzerland (EUSA)

Amendments to the law  
regulating the  
communication of  
information relating to  
financial accounts by  
Belgian financial institutions  
and the FPS Finance, within  
the framework of an  
automatic exchange of  
information at the  
international level for tax  
purposes.

Ratification of the  
Addendum to the MCAA  
CRS  
+  
Royal Decrees (secondary  
legislation)



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## 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

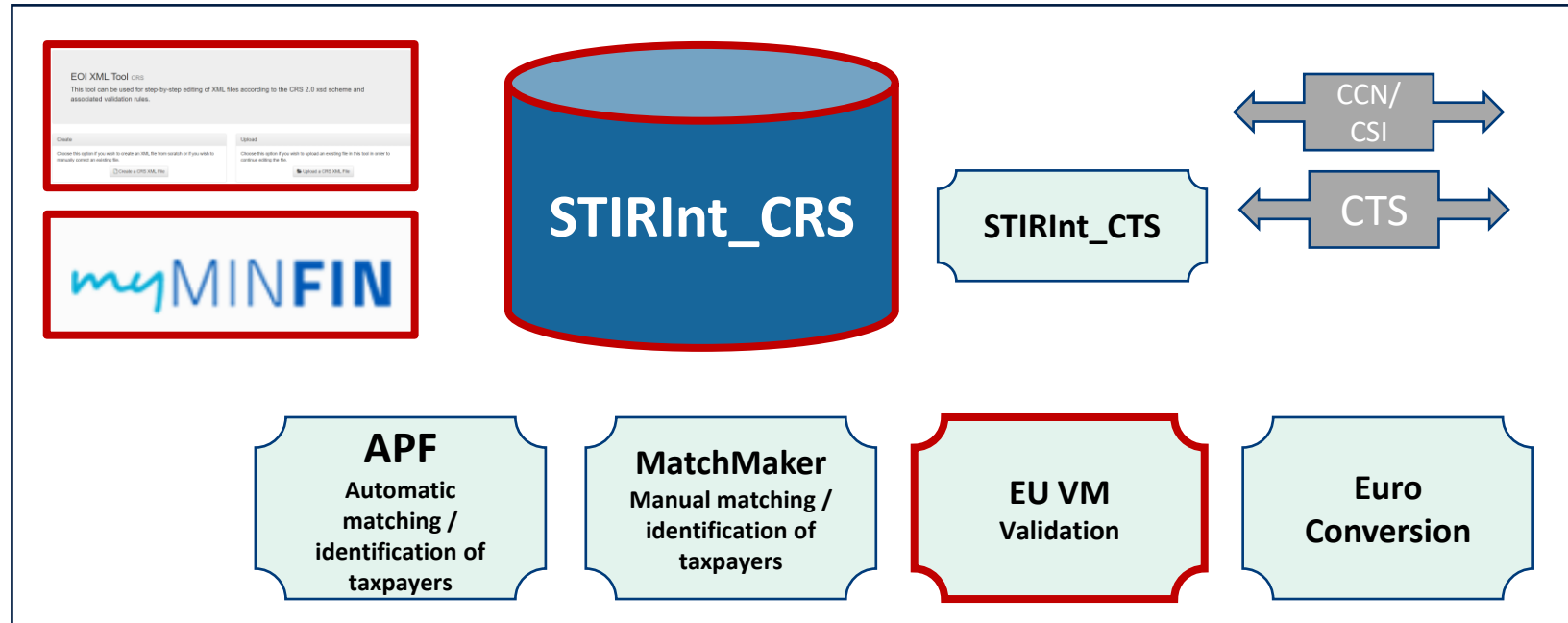
- **Non IT Products**

- Operational guidance
- Communication
- Operational process



# OPERATIONAL IMPLEMENTATION : SCOPE – IT INFRASTRUCTURE

AEOI Tools  
CRS IT  
Architecture  
STIRInt\_CRS



## 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**

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

Reporting  
Tool

- Simulation Portal
- Mirror of the production environment

**TEST**

**XML Tool**

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



# OPERATIONAL IMPLEMENTATION : SCOPE – AEOI IN TOOLS

Partner Jurisdictions

SPF Finances

Confidentiality & DataSafeGuard

EU MS

CCN/CSI

Non  
EU MS

CTS  
Platform

STIRint\_CRS

Reception  
Validation  
Status message  
Unpack  
Matching  
Conversion €

Consultation

- TAXI
- BizTax
- MyMinfin Taxbox

Risk Analysis

- DataWareHouse

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

Receipt

Validation

Identification

Making the  
information available



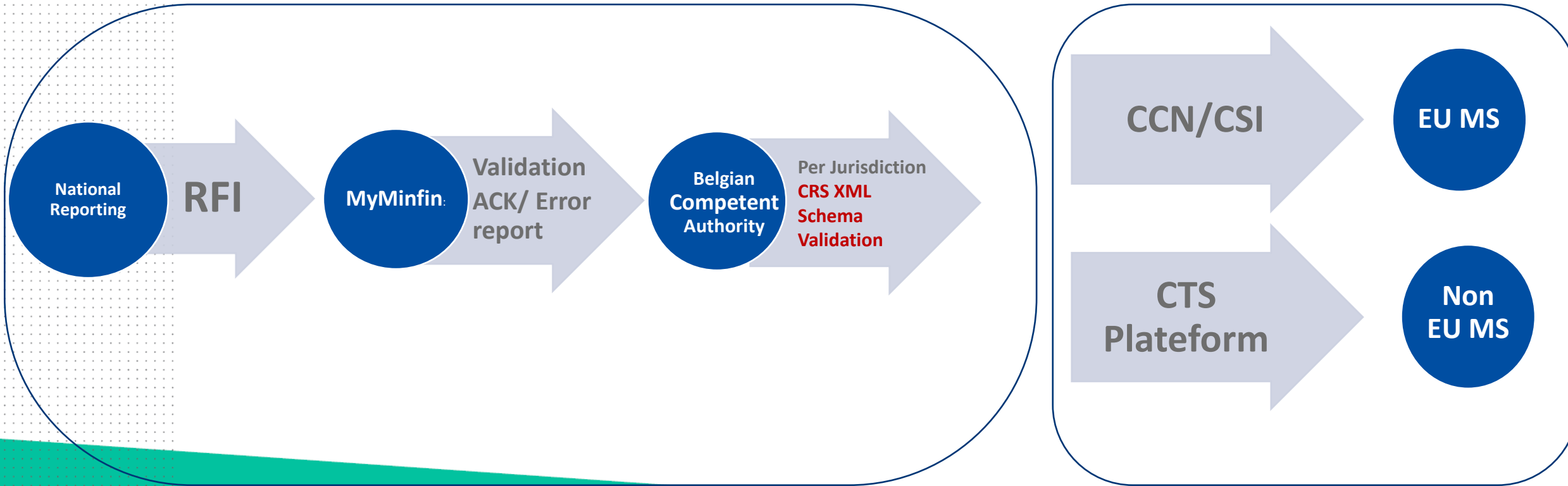
## OPERATIONAL IMPLEMENTATION : SCOPE – AEOI OUT TOOLS

National Reporting

FPS Finance

Partner Jurisdictions

Confidentiality & DataSafeGuard





Professional  
associations  
(Febelfin -  
Assuralia -  
BEAMA)

Belgian  
financial  
institutions

Staff within the  
competent  
authority

Officials  
authorized to  
use the  
information  
received

# OPERATIONAL IMPLEMENTATION : NON-IT PRODUCT

Belgian Guidance notes  
Examples of self-certification  
Operational publications

Part	
1	Introduction
2	Financial Institutions
3	Non-Financial entities
4	Financial Accounts
5	Due diligence
6	Pre-existing Individual Accounts Identification
7	New Individual Accounts Identification
8	Pre-existing entity accounts identification
9	New entity accounts identification
10	Reporting
11	Specific constructions
12	Appendix 1 - FFI NACE codes lists
13	Appendix 2 - Active NFE
14	Appendix 3 - Active NFE per nature
15	Appendix 4 - Financial ratio formula
16	Appendix 5 - Rest category - NFE
17	Appendix 6 - Examples of self-certification
18	Appendix 7 - Insurance contracts and annuities
19	Appendix 8 - CRS reporting table
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## 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 accru 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 calendaire 2023 : Prolongation complémentaire de la période de déclaration

La période de déclaration relative à l'année calendaire 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 calendaire 2023 et ne peut être considérée comme un précédent.

[QU'EST-CE QUE LE CRS ?](#)

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

[COMMENT ENVOYER DES FICHIERS XML CRS ?](#)

[FAQ ET DOCUMENTATION](#)

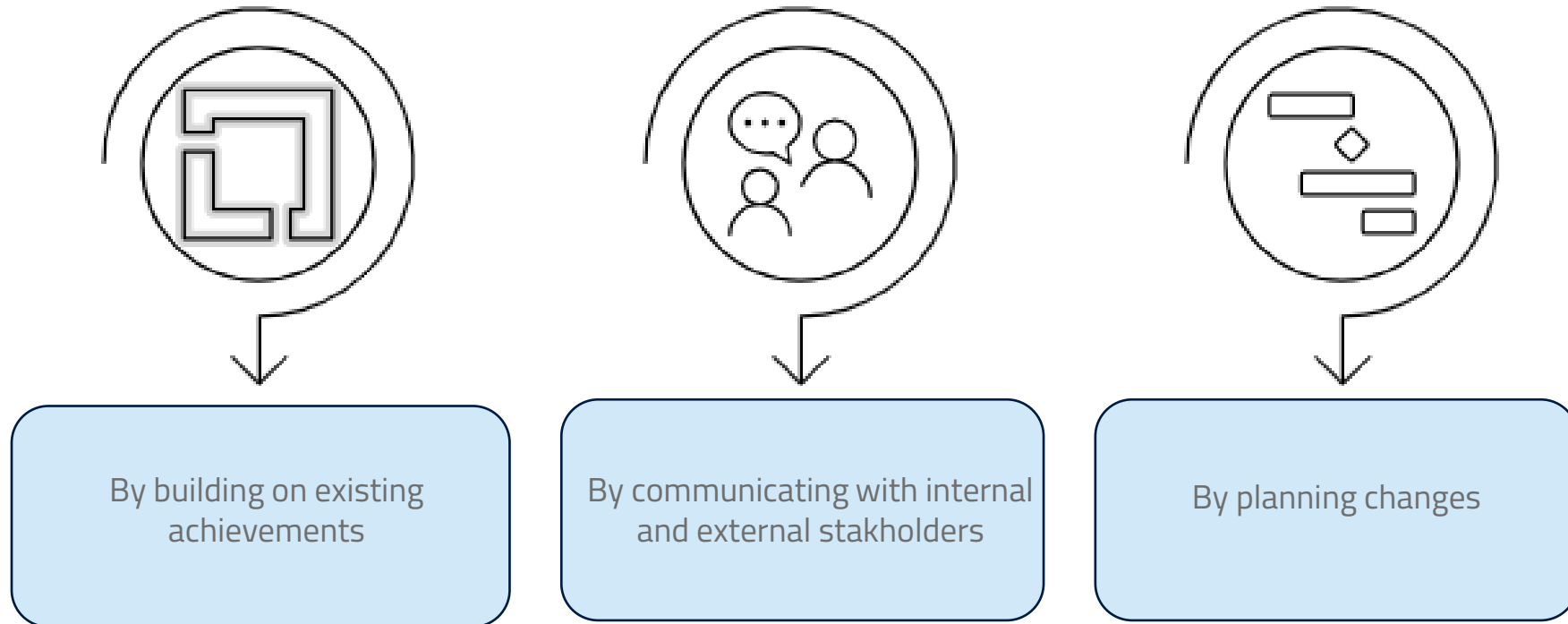
[CONTACT](#)

Operational Processes  
Internal guidance



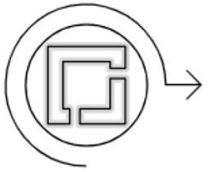


# OPERATIONAL IMPLEMENTATION : HOW?

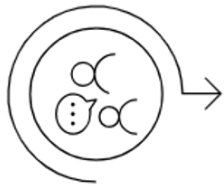




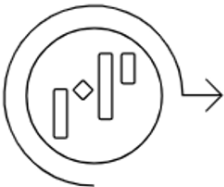
## OPERATIONAL IMPLEMENTATION : HOW? – IT PRODUCTS



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

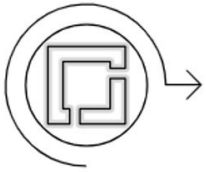


Overall planning and regular meetings with technical teams to coordinate implementation and schedule changes

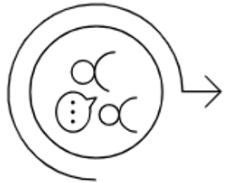




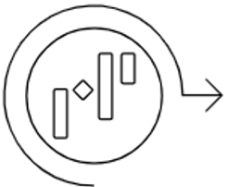
## OPERATIONAL IMPLEMENTATION : HOW? – NON-IT PRODUCTS



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



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## 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





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**THANK YOU FOR YOUR ATTENTION !**

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