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**Interinstitutional Files:**

2025/0200 (NLE)  
2025/0213 (NLE)  
2025/0216 (NLE)  
2025/0220 (NLE)  
2025/0225 (NLE)

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FISC 238  
ECOFIN 1158  
AND 12  
CH 45  
FL 49  
MC 12  
SM 11

**'I/A' ITEM NOTE**

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From: General Secretariat of the Council

To: Permanent Representatives Committee/Council

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Subject: Council Decisions on the signing of the Amending Protocols to the Agreements between the EU and Switzerland, Liechtenstein, Andorra, Monaco and San Marino on the automatic exchange of financial account information to improve international tax compliance

- Council Decision on the signing and provisional application of the Amending Protocol to the Agreement between the EU and Switzerland on the automatic exchange of financial account information
- Council Decision on the signing of the Amending Protocol to the Agreement between the EU and Liechtenstein on the automatic exchange of financial account information
- Council Decision on the signing of the Amending Protocol to the Agreement between the EU and Andorra on the automatic exchange of financial account information
- Council Decision on the signing of the Amending Protocol to the Agreement between the EU and Monaco on the automatic exchange of financial account information
- Council Decision on the signing of the Amending Protocol to the Agreement between the EU and San Marino on the automatic exchange of financial account information

= Adoption

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1. On 10 July and 17 July 2025 the Commission tabled the proposals for Council Decisions on the signing of the Amending Protocols to the Agreements between the EU and, respectively, Switzerland, Liechtenstein, Andorra, Monaco and San Marino on the automatic exchange of financial account information to improve international tax compliance.<sup>1</sup> In the case of Switzerland, the proposal on signing covers also provisional application.
2. The aim of the existing Agreements is to improve international tax compliance in accordance with the Common Reporting Standard (CRS) developed by the Organisation for Economic Co-operation and Development (OECD). On 26 August 2022 the OECD approved changes to the CRS which will apply from 1 January 2026. The main aim of the proposals for the above mentioned Council Decisions is to ensure that the automatic exchange of financial account information between EU Member States and the respective five countries is aligned with the updated CRS and continues to take place from 1 January 2026.
3. On 21 August 2025 the European Data Protection Supervisor (EDPS) issued its opinions on the proposals for the Council Decisions<sup>2</sup>.
4. On 3 September 2025 at the meeting of the Working Party on Tax Questions (Direct Taxation) delegations agreed on the Presidency compromise texts on the Council Decisions on the signing as well as on the Amending Protocols, subject to the legal-linguistic revision of the texts. The Working Party on Tax Questions (High Level) was informed about the state of play on 23 September 2025.

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<sup>1</sup> Documents 11510/25 + ADD 1 (Switzerland); 11751/25 + ADD 1 (Liechtenstein); 11750/25 + ADD 1 (Andorra); 11760/25 + ADD 1 (Monaco); 11763/25 + ADD 1 (San Marino).

<sup>2</sup> Documents 12199/25 (Switzerland), 12195/25 (Liechtenstein), 12196/25 (Andorra), 12197/25 (Monaco), 12198/25 (San Marino).

5. Against this background, the Permanent Representatives Committee is invited to suggest to the Council to adopt as an "A" item on the agenda of one of its forthcoming meetings:
- Council Decision on the signing, on behalf of the Union, and provisional application of the Amending Protocol to the Agreement between the European Union and the Swiss Confederation on the automatic exchange of financial account information to improve international tax compliance, as finalised by the lawyer-linguists in document 11648/25;
  - Amending Protocol to the Agreement between the European Union and the Swiss Confederation on the automatic exchange of financial account information to improve international tax compliance, as finalised by the lawyer-linguists in document 11650/25;
  - Council Decision on the signing, on behalf of the Union, of the Amending Protocol to the Agreement between the European Union and the Principality of Liechtenstein on the automatic exchange of financial account information to improve international tax compliance, as finalised by the lawyer-linguists in document 11785/25;
  - Amending Protocol to the Agreement between the European Union and the Principality of Liechtenstein on the automatic exchange of financial account information to improve international tax compliance, as finalised by the lawyer-linguists in document 11786/25;
  - Council Decision on the signing, on behalf of the Union, of the Amending Protocol to the Agreement between the European Union and the Principality of Andorra on the automatic exchange of financial account information to improve international tax compliance, as finalised by the lawyer-linguists in document 11782/25;

- Amending Protocol to the Agreement between the European Union and the Principality of Andorra on the automatic exchange of financial account information to improve international tax compliance, as finalised by the lawyer-linguists in document 11783/25;
  - Council Decision on the signing, on behalf of the Union, of the Amending Protocol to the Agreement between the European Union and the Principality of Monaco on the exchange of financial account information to improve international tax compliance in accordance with the Standard for Automatic Exchange of Financial Account Information in Tax Matters developed by the Organisation for Economic Cooperation and Development (OECD), as finalised by the lawyer-linguists in document 11793/25;
  - Amending Protocol to the Agreement between the European Union and the Principality of Monaco on the exchange of financial account information to improve international tax compliance in accordance with the Standard for Automatic Exchange of Financial Account Information in Tax Matters developed by the Organisation for Economic Cooperation and Development (OECD), as finalised by the lawyer-linguists in document 11796/25;
  - Council Decision on the signing, on behalf of the Union, of the Amending Protocol to the Agreement between the European Union and the Republic of San Marino on the automatic exchange of financial account information to improve international tax compliance, as finalised by the lawyer-linguists in document 11799/25;
  - Amending Protocol to the Agreement between the European Union and the Republic of San Marino on the automatic exchange of financial account information to improve international tax compliance, as finalised by the lawyer-linguists in document 11800/25.
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