

New investigation and assessment periods

Timing & rationale	Which period?	Current regime	New regime	Takeaways
<p>What - Major amendments of tax procedures in Belgium + new investigation, assessment and retention period(s).</p> <p>When - the new regime will apply from the assessment year 2023 onwards (financial year 2022). Previous assessment years remain subject to the provisions that were applicable before the proposed provisions came into force.</p> <p>Why - aligning the periods with the real nature of the increasingly complex tasks currently entrusted to the Tax Authorities. The new regime is intended to provide Tax Authorities with more time and space to detect fraud and other irregularities, enabling Belgium to comply with international obligations related to the the exchange of information.</p>	Normal investigation and assessment period	Until 30 June assessment year +1	//	<p>Main takeaways:</p> <ul style="list-style-type: none"> • Tax Authorities will have more time and power to combat tax fraud, while also having more time and power to investigate situations with an international and complex character. • Essential to review: <ul style="list-style-type: none"> – data retention policies to take into account the retention period extended to 10 years; – audit-readiness policies. <p>PwC and PwC-Legal can assist in this respect</p>
	Ordinary period	3y	//	
	Late or non-filing of tax return	3y	4y	
	Cross-border “semi-complex” tax return	/	6y	
	Complex tax returns: CFC / Hybrid mismatch and Reportable legal construction	/	10y	
	Fraud	7y	10y	
Deadline submitting tax claim	6 months	1 y		



Selected reading:
[The new tax procedure reform](#)