

May 2026

TAX ALERT





1. Resolution of the Cabinet of Ministers of the Kyrgyz Republic No. 364 dated May 22, 2026 was adopted, introducing amendments to the procedure for the collection of tax arrears in order to implement new provisions of tax legislation.

Key changes:

- **Expansion of payment methods:** digital som has been recognized as a form of non-cash payment.
- **Extension of deadlines:** the period for delivering a notice based on the results of tax control has been increased from 30 to 60 days (effective from 2027).
- **Automation of collection procedures:**
 - tax authorities send a tax payment demand (TPD) to all banks and payment organizations without verifying the existence of accounts;
 - TPDs are generated and sent electronically through an automated information system (AIS).
- **Strengthening of enforcement mechanisms:**
 - TPD applies to all accounts, including newly opened ones;
 - funds are debited within 1 operational day;
 - if funds are insufficient, debiting occurs as funds are received;
 - debiting from foreign currency accounts is allowed with automatic conversion.
- **Obligations of banks and payment operators:**
 - required to execute TPDs on a priority and undisputed basis;
 - liability for non-compliance.
- **Control and interaction:**
 - the interaction procedure is established by the tax authority;
 - enhanced control over full repayment of an outstanding liability.
- **Guarantees and collection through a guarantor bank:**
 - the procedure for claims to the guarantor bank has been clarified.

Entry into force:

- The main provisions — **from January 1, 2026.**
- The change in the notification delivery period (from 30 to 60 days) — **from January 1, 2027.**



2. On May 20, 2026, Jogorku Kenesh of the Kyrgyz Republic adopted Resolution No. 499-VIII ratifying the **agreement between Kyrgyzstan and Japan on the avoidance of double taxation**. The agreement was signed on December 19, 2025, in Tokyo and will enter into force after the completion of domestic procedures in both countries.

