

FEBRUARY 2026

TAX ALERT





Resolution of the Cabinet of Ministers of the Kyrgyz Republic No. 77 of 10 February 2026 was adopted on amendments to the Resolution of the Cabinet of Ministers of the Kyrgyz Republic “On Measures for the Implementation of Article 307 of the Tax Code of the Kyrgyz Republic”.

Key changes:

- An updated mechanism for determining the VAT tax base for transactions identified as having risk indicators when importing goods from EAEU member states.
- The definition of a “large taxpayer” has been expanded to include any entity included in the list approved by the authorized state body.
- The VAT tax base for transactions with risk indicators shall be determined based on the average price calculated over a 60-day period, applying a reduction coefficient of 0.7 (a 30% reduction). The average price is determined using data from import declarations and electronic VAT invoices, and, where necessary, statistical data from the authorized body.
- A procedure for calculating the average price has been established based on information from import declarations and electronic VAT invoices, with the possibility of using statistical data from the authorized body.
- The list of goods subject to the risk-based mechanism will be reviewed quarterly, with the possibility of monthly adjustments based on requests from taxpayers and government authorities.
- A special regime has been introduced for large taxpayers, allowing the use of the contractual price without applying the risk-based tax base.
- The procedure for intergovernmental requests to verify pricing information has been regulated, with a review period of up to 90 days.
- A procedure has been established for importers and manufacturers to challenge the tax base determination.
- Requirements have been set for supporting documentation substantiating the declared price, including contracts, invoices, certificates, and other documents related to the relevant HS (Harmonized System) commodity classification.
- Provisions allowing previously established prices to remain in effect temporarily where current data is unavailable have been introduced.

