

# Tax News

March 2026

## The obligation to report transactions involving cryptoassets is established

---

### Executive Summary

Through **General Resolution No. 47/2026**, dated March 10, 2026, the obligation to provide information to the DNIT regarding transactions carried out with cryptoassets is established, defining the obligated parties, the content of the informative sworn statement, the filing deadlines, and the penalties applicable for non-compliance.

### **General Resolution No. 47/2026 - Establishes the obligation to provide information to the DNIT on transactions carried out with crypto assets.**

Through General Resolution No. 47/2026 (the "Resolution"), dated March 10, 2026, the National Tax Revenue Directorate ("DNIT") established the obligation to provide information on all transactions carried out with crypto assets. The rule is based on the growing economic relevance of this type of asset and the need to strengthen control, oversight, and compliance with tax obligations.

The resolution defines crypto assets as any digital representation of value or rights based on distributed ledger technology (blockchain) or similar, which is not issued or guaranteed by a central bank or public authority. The concept covers, among others, value tokens, utility tokens, stablecoins, and non-fungible tokens (NFTs). Digital

currencies issued by central banks (CBDCs) and financial instruments regulated by securities market laws are expressly excluded.

The regulation also broadly defines the concept of a cryptoasset platform, including any natural or legal person or entity, computer protocol, or smart contract that offers services for the issuance, intermediation, marketing, exchange, transfer, custody, or administration of cryptoassets, whether in a centralized (CEX) or decentralized (DEX/DeFi) manner. Custodial and non-custodial digital wallets, NFT marketplaces, and staking, lending, or yield farming platforms are also included.

### **What transactions are covered by the resolution?**

In terms of the transactions covered, the resolution encompasses virtually any operation involving crypto assets: issuance, creation (minting), mining, intermediation, marketing, exchange, custody, transfers between individuals, use as a means of payment, participation in consensus mechanisms, node operation, and any other form of disposal or transmission of crypto assets, including their possession.



### **Who is required to file the declaration?**

The parties required to file the Cryptoasset Informative Affidavit are: (a) the owner, administrator, or person responsible for cryptoasset platforms operating in the country; and (b) individuals, legal entities, and other entities resident or incorporated in the country that operate with crypto assets, when the annual amount of transactions exceeds five thousand US dollars (USD 5,000), either individually or jointly, and provided that they operate through non-resident platforms or without the intermediation of any platform.

The informative affidavit must be submitted annually, within the third month after the end of the fiscal year being declared, through the Marangatu Tax Management System. The obligation will be enforceable from the 2026 fiscal year for taxpayers with a closing date of December 31, and from the 2027 fiscal year for those with a closing date of April 30 or June 30. Obligated parties must request inclusion in the RUC (Unified Taxpayer Registry) of obligation 959-DJI Crypto Assets.

### **What must the return contain?**

As for the content of the return, the regulation requires a significant level of detail. For each transaction, the following information must be reported, at a minimum: date and time; identification of the parties involved (or, failing that, the public addresses of wallets or smart contracts); name, symbol, and network of the crypto asset; amount traded to the tenth decimal place; gross value in US dollars; commissions and gas fees; and the transaction hash with the source and destination addresses.

The types of transactions that must be reported include: purchase and sale, holding, exchange between crypto assets, donations and transfers free of charge, transfers to or from platforms and digital wallets, temporary transfers or loans, payments in kind, issuance and destruction (burning) of crypto assets, and the obtaining of returns from mining, staking, lending, or other forms of profit generation.

### **What are the penalties for non-compliance?**

In terms of penalties, late filing of the informative affidavit will be punished with a fine for non-compliance of one



million guaraníes ( 1,000,000), without prejudice to other administrative responsibilities. In addition, individuals who meet the conditions and are not registered in the RUC must register in order to comply with the resolution.

Finally, the General Directorate of Tax Collection and Assistance and the General Directorate of Large Taxpayers of the General Internal Revenue Service will be responsible for monitoring the correct application of the provisions of the resolution.

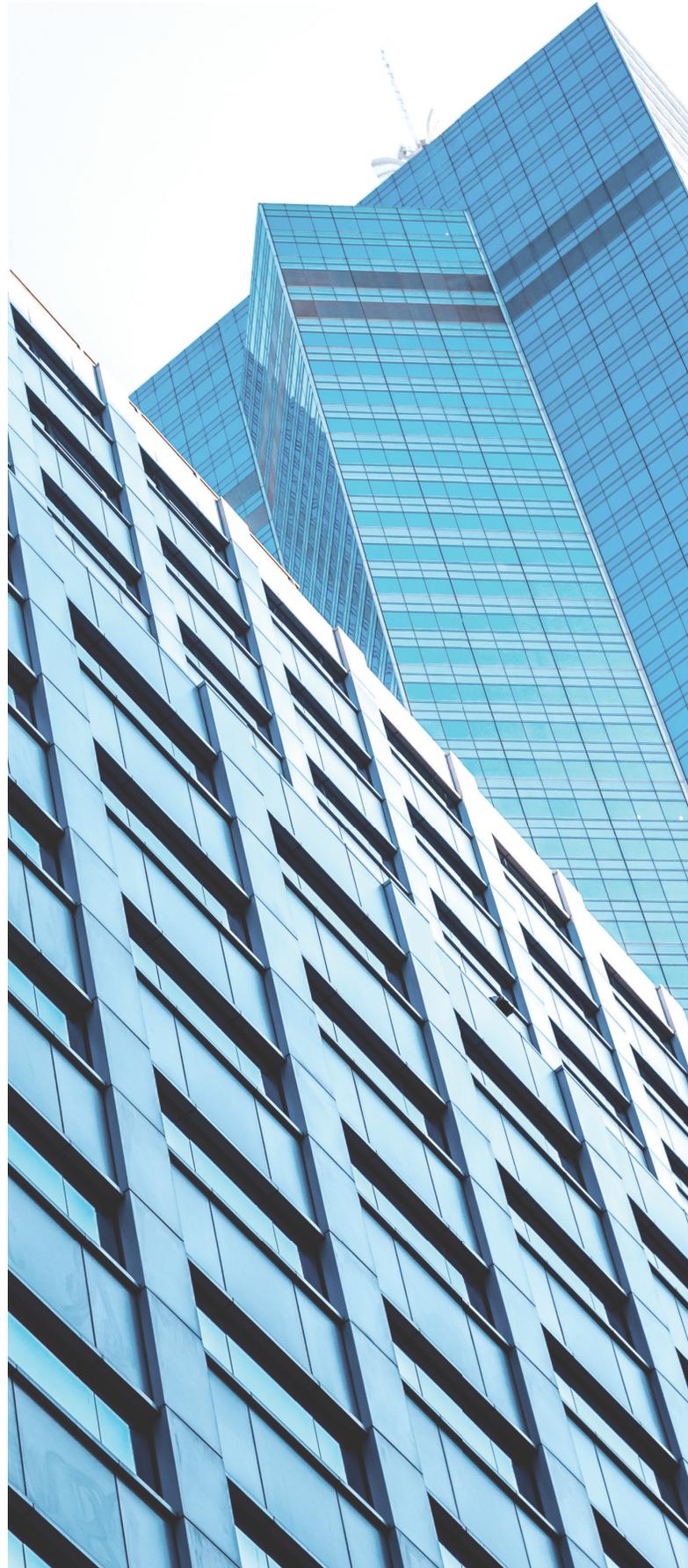
It should be noted that this resolution represents a significant step in the tax regulation of crypto assets in Paraguay, aligning the country with international trends in fiscal transparency regarding digital assets. The breadth of the definitions adopted—particularly that of a cryptoasset platform, which covers both centralized and decentralized environments—and the level of detail required in the

information to be reported reflect the DNIT's intention to obtain a comprehensive view of this market.

**How does this relate to international tax information exchange?**

It is essential to bear in mind that Paraguay acceded to the Convention on Mutual Administrative Assistance in Tax Matters, incorporated into the legal system through Law No. 6,656/2020 (MAAC). Under this multilateral treaty, the DNIT can exchange tax information with approximately 147 participating jurisdictions for the purpose of combating international tax evasion. The MAAC provides for different modes of information exchange: on request, spontaneous, and automatic. In particular, Article 6 of the MAAC constitutes the international legal basis that enables States Parties to enter into multilateral agreements between competent authorities to implement the automatic exchange of information on specific matters. In this context, Paraguay has committed to initiating its first automatic exchanges of financial account information under the Common Reporting Standard (CRS) in 2027, for which it must sign the corresponding multilateral competent authority agreement (CRS-MCAA) and adapt its domestic regulatory framework. This commitment was officially announced during the 17th plenary meeting of the Global Forum on Transparency and Exchange of Information for Tax Purposes, held in Asunción in November 2024.

The implementation of General Resolution No. 47/2026 would significantly facilitate Paraguay's future incorporation into the Crypto-Asset Reporting Framework ("CARF"), developed by the Organization for Economic Cooperation and Development ("OECD") as a specific fiscal transparency framework complementary to the CRS, whose objective is the automatic exchange of information on crypto-asset transactions between tax authorities. The CARF is implemented through a multilateral agreement between competent authorities ("CARF-MCAA"), also based on Article 6 of the MAAC. With General Resolution No. 47/2026, taxpayers and platforms will begin to familiarize themselves with reporting obligations, the DNIT will develop the necessary technological infrastructure through the Marangatu System, and the country will have a database that could be adapted to the XML schema standardized by the OECD for multilateral exchange under the CARF. Although Paraguay has not yet made a formal commitment



to implement the CARF—unlike Brazil, Colombia, Costa Rica, and Mexico, which have already committed to initiating exchanges under this framework in 2027 or 2028—the eventual adoption of the CARF would position Paraguay as a jurisdiction committed to international tax transparency, reinforcing its reputation with the Global Forum and other international organizations.

General Resolution No. 47/2026 bears notable similarities to CARF requirements. The definitions of cryptoasset and cryptoasset platform adopted by the DNIT follow a conceptual line very close to that of the OECD standard, which also covers centralized and decentralized providers. Likewise, the level of detail required in the informative affidavit—including the identification of participants, wallet addresses, transaction hashes, and dollar values—corresponds to the information that the CARF requires to be reported to tax authorities. This convergence suggests that the resolution could be laying the technical and administrative groundwork for Paraguay's eventual accession to the CARF.

However, joining the CARF also poses specific challenges. First, Paraguay will need to sign the CARF-MCAA and adapt its domestic regulatory framework to enable the automatic exchange of information under this modality—similar to what it will need to do to implement the CRS. In turn, the increase in formal reporting obligations could generate significant compliance costs for a still-nascent local crypto ecosystem. It should be noted that the OECD has advanced

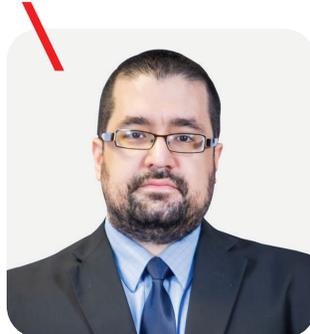
a capacity-building strategy to support the widespread implementation of the CARF, with a modular approach that jurisdictions committed to the joint implementation of the CRS and the CARF can leverage. On balance, the benefits of moving toward greater tax transparency—both in terms of country reputation and enforcement capacity—outweigh the costs of adaptation, and General Resolution No. 47/2026 constitutes a first concrete and significant step in that direction.



# Contact



**Rodolfo G. Vouga**  
[rgvouga@vouga.com.py](mailto:rgvouga@vouga.com.py)



**Andrés Vera**  
[avera@vouga.com.py](mailto:avera@vouga.com.py)



**Horacio Sánchez**  
[hsanchez@vouga.com.py](mailto:hsanchez@vouga.com.py)