

**FEASIBILITY OF ACCEPTING CRYPTOCURRENCY TRANSFERS AS A
MEDIUM FOR ANNUAL SUBSCRIPTION PAYMENT**

Presented by Finance Committee (FIC)

SUMMARY

This paper examines the feasibility of allowing Member Associations to pay their annual IFATCA subscriptions using cryptocurrency transfers. It explores regulatory, operational, financial, and compliance considerations, and provides recommendations for a limited pilot program.

1. INTRODUCTION

- 1.1. At the 64th IFATCA Conference in Abu Dhabi 2025, the issue of alternative payment methods was raised following challenges faced by some Member Associations MAs in effecting international bank transfers, including high fees, delays, and currency restrictions.
- 1.2. This working paper explores whether cryptocurrency transfers, particularly through regulated payment processors, could serve as a viable alternative for MAs subscription payments.

2. DISCUSSION

- 2.1. In recent years, cryptocurrency has shifted from being a leap in the dark to a serious global payment option, supported by increasing regulatory clarity. The EU's Markets in Crypto-Assets Regulation (MiCA) and the U.S. GENIUS Act (2025) are two examples of frameworks aimed at creating stability and trust in this space. Stablecoins tied to major currencies such as the dollar or euro are particularly attractive, as they minimize the volatility that usually comes with traditional cryptocurrencies.
- 2.2. Several respected international organizations already accept cryptocurrency payments. For instance, Save the Children has raised huge sums of money in crypto donations since becoming the first NGO to accept Bitcoin in 2013, while UNHCR (the UN Refugee Agency) takes donations in Bitcoin, Ethereum, and stablecoins. Similarly, UNICEF and organizations like the World Wildlife Fund (WWF) and Red Cross branches also receive cryptocurrency donations for environmental and humanitarian work. These examples demonstrate that

reputable international institutions have found workable models for integrating crypto into their operations.

- 2.3. For IFATCA, the model could be structured in a way that avoids direct exposure to volatility. Licensed payment processors such as Coinbase Commerce, BitPay, TripleA, and OpenNode provide invoice-based settlement services. This means that while payments can be made in crypto, the funds are converted directly into fiat and deposited into the Federation's bank account. Processor fees are typically around 1–2%, which in some regions may even be cheaper than cross-border bank charges. These processors also manage key compliance risks, including sanctions checks, anti-money laundering (AML) requirements, and adherence to the FATF Travel Rule.
- 2.4. That said, crypto adoption does not come without challenges. Some organizations have faced reputational concerns, as cryptocurrency is still linked in the public mind with speculation or illicit activity. Jurisdictional restrictions also exist: certain countries limit or ban crypto use outright, which could complicate participation for members in those regions. There is also the issue of dependency on third-party service providers—if a processor changes its policies or suspends services, IFATCA could face disruption. Beyond that, environmental concerns tied to energy-intensive blockchains (like Bitcoin's proof-of-work model) remain a point of criticism, although newer systems and stablecoins are less affected.
- 2.5. In summary, while cryptocurrency payments present IFATCA with an opportunity to modernize its payment systems and potentially reduce international transfer costs, the decision should weigh both the benefits and the risks. The experience of established organizations such as UNICEF, UNHCR, and Save the Children shows that crypto can be integrated responsibly, but reputational, regulatory, and operational considerations must be carefully managed.

3. CONCLUSION

- 3.1. Accepting cryptocurrency transfers using regulated payment processors is technically and operationally feasible. It can potentially reduce payment barriers for some Member Associations while maintaining compliance and treasury safeguards. However, their adoption should be cautious, limited in scope, and tested under a pilot arrangement.

4. RECOMMENDATIONS

- 4.1. This item should remain on the work program of FIC with the hope of conducting a trial 12-month pilot program allowing annual subscription payments via USD-pegged stablecoins through a regulated payment processor with the following conditions:
 - i. Only regulated processors with AML/sanctions compliance are used;- Funds are auto-converted to fiat and settled into IFATCA's bank account;
 - ii. Scope limited to subscription payments only.
 - iii. No direct custody of cryptocurrency by IFATCA.

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