TAXES AND CONTRIBUTIONS TAXATION IN ROMANIA

Claudiu – Constantin TALABĂ[1]
Florin – Dumitru TALABĂ[2]

ABSTRACT: *BOTH IN ROMANIA AND IN THE REST OF THE EUROPEAN STATES, THE TOPIC OF TAXES AND CONTRIBUTIONS IS EXTREMELY DEBATED AND IT'S ALWAYS IN THE SPOTLIGHT. GIVEN THAT THE AUTHORITIES OFTEN BRING MANY LEGISLATIVE CHANGES, RELATED ESPECIALLY TO THE FISCAL CODE, INCLUDING THE DEADLINES FOR TAX STATEMENT SUBMISSION AND PAYMENT OF TAXES TO THE STATE BUDGET, THE AUTHORS OF THIS ARTICLE SET OUT TO SYNTHESIZE THE MAIN REGULATIONS WHICH TAX PAYERS, THIS INCLUDING ALL KINDS OF OWNERS, COMPANIES, FIRMS, INCOME ACQUIRING PERSONS, NEED TO KNOW IN 2017*

KEYWORDS: *TAXES, FISCAL LEGISLATION, EXPENSES, EXCISES, V.A.T.,*

I. THE CONTENT AND ROLE OF TAXES

Taxes are a form of sampling a portion of the income and/or wealth of natural or legal persons available to the state to cover public expenditures. This sampling is mandatory, non-refundable and without counter performance from the state.

The mandatory nature of taxes must be understood in the sense that their payment to the state is a task imposed on all natural and/or legal persons who make income from a certain source or possess a certain type of wealth for which, according to the law, they owe due.

The burden of paying income or profit tax rests with all natural and/or legal persons who make income from a certain source provided by law.

The role of taxes is manifested financially, economically and socially, the role of taxes that occur financially is the most important, as it is the main mean of obtaining the financial resources needed to cover public expenditures.

On a social level, the role of taxes is reflected in the fact that through them, the state proceeds to redistributing a large part of the gross domestic product between social groups and individuals, between natural and legal persons, granting social benefits to certain categories of persons, or tax incentives to encourage, stimulate certain areas of activity or areas considered disadvantaged.

[1] Police officer at Romanian General Police Inspectorate – Gorj County Police Inspectorate
[2] Police officer at Romanian General Police Inspectorate – Economic Criminality Investigation Directorate

II. THE SUBJECT OF THE TAX

The subject of the tax is the concrete element underlying the tax. It may be different depending on the origin of the income, the purpose pursued and the nature of the payer.

They may be subject to taxes and contributions: income, profit, price or fare, movable or immovable property, act or deed. Among the categories of taxable objects, the most widespread is *the income* through the variety of forms that it takes within the person who acquires it.

The income is the amount that a natural person earns from work, through collateral acts, or from services. Profit is included in the calculation basis by the difference between income and expense adjusted with non-deductible amounts. The price or fare can form the basis of calculation where the amounts owed to the budget are included in its structure (VAT, excise duties, etc.). The acts and deeds are used as the object of taxation, especially in setting the stamp taxes established for the issuance and authentication of some acts, the opening and debating of the successions, the settlement of the disputes by the courts.

III. THE CALCULATION BASE OR TAX MATERIAL

The calculation base or tax material is the element on which the tax calculation is based. Sometimes the taxable object is also the calculation basis. In the case of income (wages, profit, VAT), the calculation basis refers the determination of this taxable object. In other cases, the calculation basis differs from the taxable object and occurs as a distinct element (for example in the case of building taxes, the taxable object is the building and the calculation basis is the taxable value of the building).

Due to the extremely diverse nature of items that can be charged, several evaluation methods are used, among which:

- method of tax returns submitted by payers or third parties;
- flat-rate method;
- outdoor sign method, etc.

The direct evaluation method may use an intermediate or final tax base. The final tax base may be the result of influences occurred during the tax process, when deductions or legal deviations may appear.

A first criterion classifies evaluation methods in:

- direct assessment - based on taxpayers' declarations;
- indirect evaluation (by presumption):

Other types of evaluation methods may consist in:

- assessment based on third party statements;
- assessment based on external signs;
- flat rate assessment;
- administrative assessment.

1. Assessment based on fiscal declarations

The method of assessing the calculation base through the taxpayers' tax declaration is not a perfect method, but it has certain advantages compared to the practices previously used. The method is based on the honesty of the taxpayers and the deposited statements, but also on the right of the fiscal bodies to exercise control, allowing the correction of errors made with or without intent. However, the method has the disadvantage that it offers taxpayers the possibility to evade some of the taxable subject that can be charged through various techniques: *false documents, intentional fraudulent omissions, etc.*

This principle is intended to allow the taxpayer to comply voluntarily with the intention of impregnating ideas through exemplary power and tax incentives with the scope to determine to declare and pay taxes and contribution owed without the need for unannounced or subsequent controls, and which would have far more serious consequences.

The assessment based on the tax statements of third parties who know exactly the payer's situation, sometimes comes to complete the previous method or can even be used as an independent method. It , also has the risk of not declaring some income, especially those in the parallel economy, or when some tax goods are not accounted for.

Flat-rate assessment is applicable where there are very many payers who have the obligation to keep summary records of the income or who are not obliged to keep these records. The method has advantages, as well as disadvantages. For taxpayers, the method is convenient, simplifying, and eliminating bookkeeping that involves some expenses. The method has the disadvantage that, irrespective of the techniques and procedures used, there is an undervaluation of the tax matter. Examples in this matter could be taxation of companies with a object of activity of restaurant or fast food depending on the seats declared at the tables or the tax of car wash services depending on the ramps available.

2. Assessment based on external signs (by presumption)

This method is simple but also imperfect, corresponding to some elements of fiscal justice.

In Romania, all the above-mentioned methods are generally used in assessment, but due to the practice and routine of the Fiscal Administration employees, *the method of direct assessment* and *the method of assessment based on income rules* are the most common used.

The method of direct assessment consists in determining the taxable income actually realized by the taxpayer. At its base is the declaration of taxation.

The method of assessment based on income rules is to establish a uniform, equal income for all who own a source of income released under identical conditions.

3. Tax components

The *subject of the tax* (*the taxpayer*) is the natural or legal persons who own or carry out the taxable object and which, according to the law, has the obligation to pay towards the budget. For a person to be subject, it must be able to exercise civil rights or have legal personality. For example: a profit-making company enters into legal relationships with the state; the employee who earns salary from income is the subject of wage tax and enters into legal relations with the state.

The *bearer* (*recipient*) of the tax is the person who actually supports the tax.

The *object of taxation* is the subject matter of taxation. For direct taxes, the object of taxation may be income or wealth.

The *source of tax* shows from what the tax is paid.

The *taxing unit* is used to express the size of the taxable object. As unit of taxation we can meet: monetary unit, square meter of usable area, hectare of land, piece, kilogram, liter, etc.

The *rate of tax* or the tax rate is the tax per unit of taxation.

The *mode of taxation* is the totality of the measures taken by the tax authorities in relation with each taxable subject, for the identification of the taxable object, the determination of the size of the tax material and the determination of the state tax owed.

The *payment term* indicates the date until which the tax has to be paid to the state.

IV. TYPES OF TAXES

1. Direct taxes: corporate income tax, dividend tax, income tax on individuals, wage tax and micro-enterprise tax.

Classification of direct taxes:

1.1. Real taxes

Real taxes (objective taxes or product taxes) are established *in relation with certain material objects* (land, buildings, factories, shops, etc.), taking into account the personal situation of the subject of the tax, applies to the gross product of the taxable object without any link to the subject matter of the tax. Types of real taxes are: land tax; tax on buildings; tax on industrial activities, trade and liberal professions, (applicable taxes in the field of gambling, respectively licenses and permits on machines); tax on movable capital or money.

1.2. Personal taxes

Personal taxes come in the form of: a) taxes *on income*; b) taxes on *wealth*, in close connection with the personal situation of the subject of the tax, which is why they are also known as subjective taxes.

Income taxes consist on taxes applicable to individuals and corporate taxes.

Taxes on wealth: on the actual wealth, on the movement of wealth (inheritance tax, sale, donation, stock-value bonds, bonds*)* and on wealth gains (added-value tax due to value increase of the building without the owner having made an investment in this respect - tax scales on notary fees imposed).

The single tax rate for most types of income made by individuals (natural persons) is 16%.

The categories of taxable incomes are:

- incomes from salaries;
- incomes from independent activities;
- incomes from the disposal of the use of the property (rent);
- retirement income over 1,000 Ron per month;
- incomes from agricultural, forestry and fish farming activities;
- incomes from prizes and gambling;
- incomes from investments;
- incomes from real estate transactions;
- incomes from other sources.

The categories of incomes exempted from taxes are*:*

- pensions within the minimum retirement point and social security benefits received;
- state allowances for children;
- maintenance pensions;
- scholarships for pupils, students and doctoral students;
- interests paid for state tiles and for sight deposits in accounts of banks;
- the amounts or goods received as aid;
- donations;
- sponsorships (to people who receive them);
- the amounts received by insured persons under the insurance contracts for goods or persons;
- incomes obtained from the trading of movable values, etc.
- the salary related to the conception and creation of software (certain criteria must be met, both by the employer and the employee); etc.

As a general rule, the declaration and payment of profit tax is made quarterly, until the 25th of the first month following the end of the I-III trimesters.

The finalization and payment of the profit tax for the fiscal year concerned shall be made until the 25 of March of the following year.

By way of exception, nonprofit organizations and companies which have earnings from cereals, technical plants and potato crops, fruit growing and viticulture have the obligation to declare and pay the annual profit tax, up to 25 of February of the following year.

Starting January 1, 2013, companies can opt for declaring and paying annual profit tax, with early payments made quarterly, and the option made is mandatory for at least two consecutive fiscal years.

The fiscal year is considered to be the calendar year.

The accounting year is usually the calendar year, but starting with 2009, certain categories of entities (Romanian branches of foreign companies, consolidated Romanian subsidiaries and subsidiaries of branches of foreign companies) may set a financial year that does not coincide with the calendar year, if the financial year of the parent company differs from the calendar year;

Setting a financial reporting period different from the calendar year does not change the period for which the profit tax is calculated, namely the calendar year.

The standard rate of profit tax is 16%, but there are some distinct odds for various specific activities such as gambling where the share is 5% of the income earned from these activities.

Taxation base: taxable profit is calculated as the difference between the income from any source and the expenses incurred for the purpose of realizing income from a tax year from which non-taxable income is deducted and to which non-deductible expenses are added.

The entities paying taxes on profits are:

• romanian companies;

• foreign companies operating in Romania through a permanent establishment;

• foreign companies and non-resident individuals who carry out activities in Romania in an association with or without legal personality;

• Foreign companies that earn income from or in connection with the movable transactions or transactions with shares / social parts of a Romanian company;

• resident natural persons associated with Romanian legal persons, for the incomes obtained both in Romania and abroad from associations without legal personality;

• legal entities with headquarters in Romania, established according to European law.

The entities exempt for profit tax are:

• state institutions, for specific activity;

• microenterprises;

• religious cults;

• education;

• owners' associations;

• Deposit Guarantee Fund in the Banking System, Investor Compensation Fund, Private Pension Guarantee Fund;

• The National Bank of Romania;

• non-profit organizations for specific activities; for economic activities within the limit of EUR 15,000 / year or 10% of the total exempted revenues.

2. Indirect taxes:

2.1. Excises - consumer fees

Excises are a special form of consumption tax due to the state budget for certain products in the country and from import, being included in their sales price.

They are levied for products that are consumed in large quantities and can not be replaced by consumers with others of the same type.

The categories of goods subject to excise duty are:

• alcohol, distillates, alcoholic beverages, wines and beer;

• tobacco products;

• energy products (gasoline, diesel, LPG, fuel oil, electricity);

• other products and product groups (coffee, crystal products, jewelry, fur, perfumery, cars, weapons, yachts and other vessels / craft).

2.2. Value added tax

The VAT (value added tax) represents the main indirect tax in Romania in terms of volume in the receipts to the state budget as well as from the point of view of the scope.

As a general rule, the tax period is the calendar month. An exception in this matter would be the situation where, for taxable persons registered for VAT purposes whose fiscal value at the end of the previous year did not exceed 100,000 euro and which during the previous year did not make one or more intra-Community acquisitions, the tax period is the calendar quarter.

As of 1 August 2010, taxable persons and non-taxable legal persons, which carry out intra-Community trade in goods and services, have the obligation to register in the "Register of intra-Community operators".

As of 1 January 2013, the system of VAT payable on collection is mandatory, for companies whose fiscal value in the previous calendar year does not exceed the ceiling of 2.250.000 lei, or 500.000 euros.

As of 1 January 2013, specific rules apply to the VAT collection system, for which companies are highlighted in the "Register of taxable persons applying the VAT system at the time of collection".

Domains in which VAT is applied are:

• delivery of goods (merchandising);

• service provision performed on the territory of the country

• import of goods and services;

• transfer of ownership of immovable property between taxpayers, as well as between them and natural persons;

• services performed by providers with headquarters or domicile abroad for which the place of supply is considered to be Romania.

Domains and situations in which VAT exemptions operates are:

• rents (for which the taxpayer can opt, if the VAT invoicing is to be notified to the territorial tax body) If the invoicing without VAT is opted, it is necessary to consider adjusting the right of deduction of the VAT on the acquisition or in relation to the expenses modernization, transformation, etc., the adjustment rates differ depending on the age of the buildings;

• hospitalization, medical care, and closely related operations.

• service provided by dentists and dental technicians as well as delivery of dentures

• care and supervision services provided by medical and paramedical staff

• transport of sick and injured persons by authorized entities

• organ and blood supply of human origin

• educational activity

• meditations given in particular by teachers

• service provision related to practicing sport or physical education

• public postal services, activities specific to public radio stations and television, other than commercial activities.

The standard rate of tax has encountered several modifications during the last years, such as follows:

Starting the 1st of July 2010, VAT standard rate was increased from 19% to 24%, an significant increment with a drastic effect on all areas and domains in which it had applicability.

From the 1st of January 2016, VAT standard rate was reduced from 24% to 20%, and starting the 1st of 2017, VAT rate suffered the last modification, being reduced from 20% to 19% (same value as in 2010)[3].

According to the 2017 updated fiscal legislation, the reduced 9% VAT rate applies to the following services and domains:

- delivery of orthopedic products;
- delivery of medicines for human and veterinary use;
- hotel accommodation and other similar facilities, including the renting of lands destined for camping;
- delivery of aliments, including nonalcoholic drinks, destined for human or animal consumption, live domestic animals and birds, seeds, plants and ingredients used in preparing aliments, products used as aliments supplements or substitutes;
- catering and restaurant services, with the exception of alcoholic drinks (other than draft beer);
- delivery of drinkable water and water destined for agricultural irrigation;
- delivery of fertilizers and pesticides used in agriculture, seeds and other agricultural products destined for seeding or planting and services similar to the ones mentioned above, used in the agricultural sector and stipulated in the common order of public finances minister and rural development and agricultural minister[4]

The reduced 5% VAT rate applies to the following services and domains:

- school books, books, newspapers and magazines, other than those with exclusively or mainly advertising purposes ;
- services consisting in allowing access to castles, museums, memorial houses, historical monuments, archeological and architectural monuments, zoos, fairs, expositions, cultural and sport events, cinematography, other than the ones excepted according to art. 292 of Law no. 227/2015;
- delivery of homes as a part of social policy, including the land on which they are build

2.3. Taxation of the microenterprises

A microenterprise can be defined as a company that generates income other than: banking, insurance and reinsurance, capital markets, gambling, consulting and management.

Taxation of micro-enterprises:

• the fiscal year of the micro-enterprise is the calendar year and the tax rate on the revenue of micro-enterprises is **3%.**

The taxable base of the income tax on microenterprises is the income from any source, which is deducted from:

[3] Law no. 571/2003 regarding the Fiscal Code which was replaced with Low no. 227/2015 regarding the Fiscal Code

[4] The common order of public finances minister and rural development and agricultural minister no. 1155/868/2016 regarding the reduced 9% VAT rate for delivery of fertilizers and pesticides used in agriculture, seeds and other agricultural products destined for seeding or planting and services similar to the ones mentioned, used in the agricultural sector

• income related to the cost of product stocks;
• income related to costs of services in progress;
• income from the production of tangible and intangible assets;
• income from operating grants;
• income from provisions and adjustments for impairment or loss of value;
• income resulting from the restitution or cancellation of interest and / or late payment penalties, which were non-deductible expenses when calculating taxable profit;
• income from indemnities, from the insurance / reinsurance companies, for the damages caused to the goods of the nature of the stocks or of the tangible assets;
• income from indemnities, from the insurance / reinsurance companies, for the damages caused to the goods of the nature of the stocks or of the own tangible assets;

2.4. Customs taxes

Customs taxes are those levies taken by the state when goods cross the country's borders (import, export, transit).

The basis of taxation is the customs value of the goods.

The rates of taxation are set out in the Customs Tariff (*T.A.R.I.C. Nomenclature*[5]).

Exemption from customs taxes:

• aids and donations of social, humanitarian, sports, didactic, etc.
• goods originating in the countries of the European Union
• foreign goods that become state property
• non-commercial samples, advertising materials, documentation, etc.
• goods of Romanian origin
• goods repaired abroad or replaced

2.5. Stamp and registration tax

The stamp and registration tax represents the payment of services rendered or works by various bodies or public institutions that receive, prepare or issue different acts, provide different services and solve certain legitimate interests of the subjects.

Stamp taxes are perceived on the following categories of documents and services:

• opening a actions and introducing applications to the courts
• exercise of appeals against judgments
• requests for the release of copies of certain acts
• for settling disputes before the judiciary bodies
• provision of services by public notaries
• authentication of certain acts, registration, correction, and reconfiguration of civil status acts upon request
• issuance of identification and citizenship documents
• certain permits and passports, driving licenses, hunting, fishing, etc.

VI. TYPES OF EXPENSES

Expenses are divided into three categories: 1) deductible expenses; 2) limited deductible expenses; 3) non-deductible expenses.

1.1. Integral deductible expenses

The general rule provides that only expenditures incurred for the purpose of taxable income are considered deductible expenses. The deductible expenses include:

[5] Regulation (EEC) No 2658/87 of 23 July 1987 established the tariff and statistical nomenclature and the Common Customs Tariff – *Integrated Tariff of the European Communities*

• expenses for purchasing packages;
• expenses for work protection and expenses for the prevention of work accidents and occupational diseases;
• expenses such as work accidents and occupational diseases contributions and the expenses of insurance premiums for professional risk insurance;
• advertising expenses made to popularize the firm, products or services, based on a written contract, as well as the costs associated with the production of the materials needed for the broadcasting of the advertising messages, including the goods that are given in the advertising campaigns as samples, for the testing of the products and demonstrations at points of sale, as well as other goods and services provided to stimulate sales;
• transportation and accommodation expenses in the country and abroad, for employees and administrators, as well as for other natural persons assimilated to them;
• expenses for training and professional development of the staff employed;
• expenses for marketing, market study, promotion on existing or new markets, participation in fairs and exhibitions, business missions, publishing of own informative materials;
• research and development expenses that do not meet the conditions for being recognized as an intangible asset in accounting terms;
• expenses for improvement of management, IT systems, introduction, maintenance and improvement of quality management systems, obtaining certification according to quality standards;
• expenses on environmental protection and conservation of resources;
• the losses recorded in the removal of the unincorporated receivables, provided that: the bankruptcy procedure of the debtors was closed on the basis of a court decision, the debtor died and the claim can not be recovered from the heirs, the debtor is dissolved in the case of the company with limited liability with a single associate, or liquidated, without hier, or the debtor who is experiencing major financial difficulties affecting the entire patrimony;
• costs of fines, interest, penalties or increases due in commercial contracts;
• registration fees, contributions and compulsory contributions, regulated by the normative acts in force;
• Enrollment fees, contributions and contributions due to the Chambers of Commerce and Industry, trade unions and employers' organizations;
• expenses related to the valuation / revaluation of tangible fixed assets belonging to the public domain of the state or of the administrative-territorial units, received in administration / concession;
• expenditure on land registration or real estate advertising, as the case may be, the ownership of the state or of the territorial administrative units over the public goods received in the administration / concession;
• costs incurred as a result of the refund of subsidies received from national and international authorities;
• expenses with employee benefits in cash-settled cash instruments when the benefits are actually granted if they are taxed under the income tax rules.

1.2. Limited deductible expenses:
• Protocol expenses within the limit of a 2% quota applied to the difference between the total taxable income and the total tax expense, other than the protocol expenses and the corporation tax expenses;

• travel allowance paid to employees in Romania and abroad is limited to 2.5 times the legal level established for public institutions;
• social expenses are deductible up to 2% of wage bill;
• perishable, within the limits established by the specialized bodies of the central administration, together with the specialized institutions, with the approval of the Ministry of Public Finance;
• expenditure on meal tickets provided by employers;
• expenses with provisions and reserves under certain specific conditions;
• interest expenses and foreign exchange differences according to the reference interest rate of the National Bank of Romania and the level of indebtedness of the companies;
• Depreciation and specific expenses for cars, which fulfill certain characteristics, the amortization is limited to 1,500 lei / month;
• The costs of voluntary pensions are deductible for the employer up to the limit of 400 EUR per year per person and the voluntary health insurance premiums up to 250 EUR per year per person;
• Fees and contributions paid to non-governmental organizations and professional associations linked to the taxpayer's activity are deductible up to 4,000 € per year;
• operating, maintenance and repair expenses related to the cars used by persons with management and administration functions of the legal entity are limited deductible to at most one car belonging to each person with such attributions.

2. Nondeductible expenditure:
• Romanian corporate tax expenses, as well as income tax paid abroad;
• Interest / delay increases, fines, confiscations and penalties owed to Romanian / foreign authorities;
• expenditure on inventories or tangible assets identified as lacking in management or degraded, non-imputable, for which no insurance contracts have been concluded;
• expenses incurred in favor of shareholders or associates, other than those generated by payments for goods delivered or services provided to the taxpayer, at the market price for such goods or services; Attention: advances for settlement or even lodging of accommodation bills or different expenses of the company's representatives.
• expenses that are not based on supporting documents;
• Expenses with contributions paid over the established limits or not regulated by normative acts;
• wage and / or salary costs that are not taxed on the employee;
• expenditure on management services, consultancy, assistance or other services, for which taxpayers can not justify the need to provide them for the purposes of the activities carried out and for which no contracts are concluded;
• Expenditure on insurance premiums not related to the company's assets;
• sponsorship and private scholarship expenses are non-deductible, for which, however, tax credit is granted up to the lowest of 0,3% of turnover and 20% of the corporation tax due;
• expenditure recorded in the accounting records, based on a document issued by an inactive taxpayer;
• expenditures representing the value of fixed assets depreciations, if, as a result of a revaluation, there is a decrease in their value;
• 50% of the cost of motorized road vehicles not used solely for the purpose of economic activity with a maximum total mass not exceeding 3,500 kg and not more than 9 passenger seating, including the driver's seat which are in the ownership or use of

the company, except: vehicles used exclusively for emergency services, security and protection services and courier services; vehicles used by sales and purchasing agents; vehicles used for the carriage of passengers, including taxi services; vehicles used for the provision of paid services, including for hire to others or for training by driving schools; vehicles used as merchandise for commercial purposes.

• expenses with employee benefits in equity-settled equity instruments;

• expenses recorded in the accounting records, regardless of their nature, subsequently proved to be related to acts of corruption

VII. FISCAL MONOPOLIES

Monopoly is the right that the state reserves to produce and / or market certain consumer goods. Thus the state establishes tax monopolies on the production and / or selling of goods such as tobacco, salt, alcohol, matches etc.

The tax is equal to the difference between the selling price set by the State and the cost of production including the entrepreneur's profit.

Classification of monopolies according to their scope:

a) Full fiscal monopolies: it is set up by the state both on the production and on the wholesale or retail sale of goods;

b) Partial fiscal monopolies: it is established only on the production and wholesale trade, or only on the retail trade.

The income generated by the state through the establishment of fiscal monopolies are formed, on the one hand, *from the profit obtained in the process of production* of the respective goods, and on the other hand from the *indirect tax* included in the price, which is collected from the consumers of these goods .

Thus, state tax monopolies affect the real incomes of consumers**.**

REFERENCES

1. Low no. 227/2015 regarding the Fiscal Code
2. Government Emergency Ordinance no. 50/27.10.2015 for modifying and completing Law no. 227/2015 and Law no. 207/2015
3. Law no. 358/31.12.2015 for the approval of Government Emergency Ordinance no. 57/09.12.2015 for modifying and completing Law no. 227/2015 and Law no. 207/2015
4. Government Emergency Ordinance no. 32/26.06.2016 for completing Law no. 227/2015 and setting some financial and fiscal regulations
5. Government Emergency Ordinance no. 46/31.08.2016 for completing Law no. 227/2015
6. Government Emergency Ordinance no. 3/06.01.2017 for completing Law no. 227/2015
7. Emergency Ordinance no. 9/27.01.2017 regarding some budgetary measures in 2017, prorogation of some terms, modifying and completing some normative acts
8. Law no. 26/24.03.2017 for the approval of Government Emergency Ordinance no. 46/2016 for completing Law no. 227/2015
9. Law no. 136/13.06.2017 for the approval of Government Emergency Ordinance no. 32/2016 for completing Law no. 227/2015 regarding the Fiscal Code, some financial and fiscal regulations
10. Law no. 177/18.07.2017 for the approval of Government Emergency Ordinance no. 3/2017 for modifying and completing Law no. 227/2015 regarding the Fiscal Code
11. Regulation (EEC) No 2658/87 of 23 July 1987
12. Law no. 571/2003 regarding the Fiscal Code which