

?????? C-40/09

Astra Zeneca UK Ltd

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Commissioners for Her Majesty's Revenue and Customs

(?????? ??? VAT and Duties Tribunal, Manchester, ??? ??? ?????? ?????????????? ??????????)

«????? ?????? ??? – ??? 2, ?????? 1 – ?????? ??? “????? ?????? ?????????? ?? ?????? ?????? ??????”
– ?????? ?????? ?????????? ?????????? ??? ?????? ?????? ?????????? ??? ?? ?????? ???
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????????? ????? – ?????????? ??? ?????????? – ?????? ?????? ?????? – ?????
????? ??? ?????? ?????????? ??? – ?????? ?????????? ??? – ?????? ?????? – ?????? ??????
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(?????? ??? ?????????? 77/388, ??? 2, ??? 1)

?? ??? 2, ??? 1, ??? ??? ?????? 77/388, ??? ?????????? ??? ?????????? ???
????? ??? ?????? ?? ?????? ??? ?????? ?????? ??????, ??? ?????????? ?? ???
????? 95/7, ??? ??? ?????? ??? ? ?????? ?????? ?????? ??????, ??? ??????, ? ???
????? ?? ?? ??? ?????? ?????? ?? ??? ?????? ?????????? ?????? ?????????? ???, ???
????? ?????? ??? ?? ??? ?????? ?????? ??? ?? ?????? ?????????? ??? ?????? ??? ?????? ???
?? ??? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?????????.

??????????, ??? ??? ?????????? ??? ?? ??? ?????????? ?????? ?????????? ???
????????? ??? ?? ??? ?????? ??? ?????? ?????? ??? ?? ??? ?????? ?????? ?????????? ??
??????????, ?? ??? ?????? ?????????? ??? ?? ??? ?????? ??????, ?????? ??????,
????????, ??? ?? ?????????? ?? ?????? ??? ?????? ?????? ??? ?? ??????, ?? ?????????? ???
????? ??????? ?? ?????? ?????? ?????? ?????? ??? ?? ??? ?????? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ?????? ??? ?? ??? ?????? ??????, ??? ??? ?????? ???
????????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????????? ???
????????? ?? ?????????? ????. ??????, ? ?????? ?????? ?????????? ?????? ?????????? ???
?? ??????? ??? ?????? ?????? ?????????? ?????? ??? ?????? ?????????? ?? ?????,
????????? ??? ?? ?????? ?????? ?????? ?????? ??? ?? ??? ?????? ?????????? ??? ??????
?? ??????. ???????, ? ?????? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?? ???
????????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????????? ??? ?????? ?????????? ???
??? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????????? ??? ?????? ???
????? ??? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????????? ???
????? ??? ?? ?????? ??? ?????? ??? ?????? ???' ???.

(???. ??????? 29-32, 35 ??? ???????.)

??????? ??? ?????????? (????? ????)

??? 29?? ??????? 2010 (*)

«???? ??????? ??? – ??? 2, ?????? 1 – ?????? ??? “??????? ?????????? ?? ??????? ??????”
– ??????? ?????????? ?????????? ??? ?????? ?????? ?????????? ??? ?? ?????? ???
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???? ??????? C?40/09,

??. ?????????? ?????? ??????? ?????????? ?????????? ?????? ??? ?????? 234 ??,
?? ??????? ?? VAT and Duties Tribunal, Manchester (?????? ???????), ?? ??????? ??
16?? ?????????? 2009 ? ??? ?????? ??????? ??? ?????????? ??? 29 ?????????? 2009, ??
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Astra Zeneca UK Ltd

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Commissioners for Her Majesty's Revenue and Customs,

??. ?????????? (????? ????),

????????? ??? ??? K. Lenaerts, ??????? ????????, R. Silva de Lapuerta (??????????), E.
Juhász, T. von Danwitz ??? D. Šváby, ????????,

??????? ??????????: P. Mengozzi

?????????: N. Nanchev, ??????? ??????????,

?????? ??? ?? ?????? ?????????? ??? ??????? ??? ??' ?????????? ?????????? ??? ??
11?? ?????? 2010,

????????? ??? ?? ?????????? ??? ????????:

– ? Astra Zeneca UK Ltd, ?????????? ??? M. Conlon, QC, ??? D. Southern,
barrister, ?????????? ???' ?????? ??? G. Salmond, solicitor,

– ? ?????????? ??? ??????? ????????, ?????????? ??? H. Walker,
????????? ??? N. Pleming, QC,

– ? ?????????? ????????, ?????????? ??? K. ??????? ??? I. ????????,
????? ??? ??? ?? . ??????,

– ?????????? ???????, ?????????????? ??? ??? R. Lyal ??? ??? M. Afonso,
???? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ??? ??? ????
??? 22?? ??????? 2010,

?????? ??? ???????

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1 ? ?????? ??????? ?????????? ?????????? ?????? ??? ?????? ??? ?????? 2,
?????? 1, 6, ?????????? 2, ????? ??????, ??????? ??, ??? 17, ?????????? 2, ??? ???
?????? 77/388/??? ??? ???????, ??? 17?? ??? 1977, ??? ?????????? ???
????????? ??? ?????? ?????? ??? ?????? ?? ??? ?????? ?????? ?????? – ???
?????? ??? ?????????????? ????: ?????????? ?????????? ??? (?? ????. ????. 09/001, ?. 49),
???? ?????????????? ?? ??? ?????? 95/7/?? ??? ?????????? ??? 10?? ?????????? 1995
(?? L 102, ?. 18, ??? ????: ??? ??????).

2 ? ?????? ??? ??????? ??? ?????? ?????? ?????? ?????? ??? Astra Zeneca
UK Ltd (?? ????: Astra Zeneca) ??? ??? Commissioners for Her Majesty's Revenue and
Customs (?? ????: ?????? ??? Commissioners), ??????? ?? ??? ??? ??????????????
????? (?? ????: ???) ??? ?????????? ??? ?????? ??? ?????? ?????????? ???
????????? ??? ?????????? ?????????? ?? ?????? ??? ?????? ??? ?????? ???.

? ?????? ???????

3 ?? ?????? 2, ?????? 1, ??? ?????? ?????? ??????:

«???? [??] ??????????:

1. ?? ?????????? ?????? ??? ?? ?????? ??????????, ??? ?????????????????? ??
????????? ?????? ??? ?????????? ??? ?????? ??? ?????????? ??? ???, ??? ?????? ??? ??
????????? ??? ???».

4 ?? ?????? 4, ?????????? 1 ??? 2, ??? ?????? ??? ????:

«1. ?????????? ?? “????????????? ????” ?????????????? ????, ??? ?????? ??????????
??? ?? ?????????? ????, ??? ??? ??? ?????????? ?????????????? ??? ??? ??????????
???? ?????????? 2, ?????????? ??? ?????????????? ??? ?????? ??? ?????????????? ???
????????????? ????.

2. ?????????? ??????????????, ??? ?? ?????? ??? ?????? ??? ?????????? 1, ??? ?????? ??? ??
????????????? ??? ??????????, ??? ?????? ??? ?????? ??? ?????????? ??????????,
????????????? ??? ??? ?????????????? ??? ?????? ??? ?????????? ?????????? ??? ??? ?????????? ???
????. ?? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????????? ?????? ??? ?????????? ???
??????, ??? ??? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ????.»

5 ??? ?? ?????? 5, ?????????? 1, ??? ??????:

«? “????????? ????” ?????????? ? ?????????? ??? ?????????? ?? ?????? ??? ?????????? ???
????? ?? ??????»

6 ?? ?????? 6, ??????????? 1, ????? ??????, ??? ? ???? ?????? ??????? ??????:
«?? “?????? ??????????” ?????????? ??? ??????, ? ?????? ??? ?????? ?????? ?????? ?????
??? ?????? ??? ?????? 5.»

7 ?? ?????? 17, ?????????? 2, ??????? ??, ??? ?????? ???????, ?? ? ? ?????????? ??
????????? ??? ?? ?????? 28?? ??? ???????, ??????????:
«????? ?? ?????? ?? ?????? ? ?? ??????? ?????????????????? ??? ?? ?????????????????? ??
????????????????? ??????? ???, ? ?????????????? ??? ?????? ?????? ?????????? ?? ?????????? ??? ??
????? ??? ?? ?????? ?????? ?????? ??????:

?) ??? ?????????? ? ?????????????? ??? ?????????? ??? ?????? [??] ??? ?? ?????? ??? ??
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? ?????????? ?? ??? ?????????? ??? ?????? ?????????? ??? ?????? ?????????? ???.

? ??????? ?? ?????? ?????? ??? ?? ?????????? ?????? ??????

8 ? Astra Zeneca ?????? ??????? ??? ?????????????????? ??? ?????? ???
?????????????????.

9 ? ?? ??? ?????? ??????? ??? ?????? ?????????? ???, ?? ?????? ??? ?????????? ???
??, ??? ??????? ??????? ??? ?????????? ?? ??? ?????? ?????? ???, ?? ??? ???????
«????????? ??????» («Advantage Fund», ??? ????: ??????? ??????), ?? ??????
????????????? ??? ??? ?????????????? ?? ?????? ???, ???????????, ?????????? ?????????? ???
????? ?????????? ?? ??? ?????????? ?? ???????????, ??? ??? ?????? ??? ??? ?????? ???
????? ?????????? ? ?????????? ?????????? ?????????? ?????????? ?, ???
????????????? ??? ?????????? ?????? ???.

10 ?????? ?? ??? ?????? ??? Astra Zeneca ??? ?????? ?????????? ???
????????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????????? ??
????????????? ??? ?????? ???.

11 ?? ??????? ?? ?????? ?????? ?????????? ??? 10 ??? ?????? ?????? (GBP), ??? ??
????????? ??? ?????? ??? ?????????? ?????????? ??? ?????? ??? (?????? 9,25 GBP ??
9,55 GBP).

12 ? Astra Zeneca ?????????? ?? ?????????? ??? ?????? ??? ?? ?????? ??? ?????? ??? ??
????????? ?? ?????? ???, ?? ??? ?????? ???, ??? ?? ?????? ??? ?????? ??? ?????????? ???
????????????? ??? ??? ?????????? ?? ?????? ??? ?????? ??? ?????? ??? ??? ?????? ???
????? ?????????? ??? ??? ?????? ??? ?????? ??? ?????? ???.

13 ??????, ? Astra Zeneca ??????????, ?? ???????, ??? ?? ?????? ?? ?????????? ??
????????? ?? ??? ?????????? ??? ??? ?????? ??? ?????? ??? ?????????, ?? ?? ?????????? ??? ??
????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ??????, ??? ??????
?? ?????????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ??????
??? ?? ?? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

14 ???' ??????????, ? Astra Zeneca, ??? ??????? ?????? ??? ?????????? ???, ??????
????? ??????? ??? Commissioners ??????? ??? ?????????? ??? ?????? ?????? ??? ???
????????? ??? ??? ?????? ??? ?????? ??? ?????? ???.

15 ??????, ? ??????? ??? Commissioners ??????? ???, ??????, ? Astra Zeneca ???

?????????? ????????, ?? ??? ???? ??????, ??? ???? ??? ??????? ?????? ??? ?????? ???
?????????, ?????? ?? ??????? ??? ?????????????????? ??? ??? ?????? ??? ???
????????????? ??? ?????????? ?? ??? ??? ??????.

16 ? ??????? ??? Commissioners ??????? ???, ???????????, ? Astra Zeneca
?????????? ?? ???????, ?? ??? ??????, ??? ??? ??? ??????? ??? ??? ?????? ???
??????????, ??? ??????????? ?? ??????? ??? ??? ??????????? ??? ??? ??????? ???
????? ???????????, ?? ?? ??????? ??? ??? ??????? ??????????? ??? ??? ??????? ???
??????, ??? ??????? ??? ??? ?????????????? ??? ??????? ?????????? ??? ??????? ???
??????????, ??? ?? ??????? ??????? ??? ??? ??????? ??? ?????????? ?????????? ???
????????????? ??? ??????? ??? ??? ??????? ??? ?????????? ??? ?????????? ??? ??????? ???
????????????? ??? ??????? ??? ??? ??????? ??? ?????????? ??? ?????????? ??? ??????? ???
????????????? ??? ??????? ??? ??? ??????? ??? ?????????? ??? ?????????? ??? ??????? ???
????????? ??? ??????? ??? ???????, ? Astra Zeneca ?????????? ?? ???????, ?? ???
??????, ??? ??? ??? ??? ??????.

17 ???' ???????, ? ??????? ??? Commissioners ??????? ??? ?????? ??? Astra Zeneca
???? ?????????? ?? ??? ??? ?????? ???, ??? ??????? ?????? ??? ?????????? ???,
?????? ?????? ?????? ?????? ?????? ??? ?? ??????? ??? ?????????? ???, ??
????????? ??? ??????? ??? ?? ??????? ?????????? ??? ?????????? ??? ?????? ??? ??? Astra
Zeneca ????? ?????????? ???.

18 ? Astra Zeneca ?????? ??????? ??? ??? ?????? ?????????? ??????? ??? ??????????
??????????.

19 ??? ??? ??????? ????, ?? VAT and Duties Tribunal, Manchester, ?????????? ??
?????????? ?? ?????????? ??? ?? ?????????? ??? ?? ?????????? ??? ?????????? ?????????? ???
?????????:

«1) ??? ??? ?????????? ??? ??????? ???????, ??? ??? ?????????? ?????????? ???
???? ??? ?????? ??? ??????? ??????? ??? ?? ??????? ??? ?????? ??? ?????? ???
????? ??? ??????? ???????, ??? ?? ?????? 2, ?????????? 1, ??? ?????? ?????? [...] ???
?????? ??? ? ??????? ??? ?? ????? ?????????? ??? ??? ?????????? ??? ?????????? ???
?????? ??????? ??? ?????????? ???;

2) ?? ?????????? ?????????? ?????????? ??? ?????? ???????, ??? ?? ??? 6, ??????????
2, ??????? ?, [?? ??? ?????? ??????] ??? ?????? ??? ? ??????? ??? ?????????? ??? ???
????????? ??? ?????????? ??????? ?? ?? ??????? ?????????? ?????? ?? ?????????????? ??
?????? ??????????, ?????????? ??? ?? ?????? ?????? ?????????? ??? ?????? ??? ???
?????????;»

3) ?? ? ??????? ??? ??????? ??? ??????? ?????? ??? ?????? ?????????? ?? ???????
?????? ??? ??? ?????? ??? ?????? 2, ?????????? 1, [?? ??? ?????? ??????], ??? ??????
????????? ??? ?? ?????? 6, ?????????? 2, ??????? ?, [?? ??? ?????? ??????], ?? ?????? ??
????? ??? ?? ?????? 17, ?????????? 2, [?? ??? ?????? ??????] ?????????? ??? ??????????
?? [??] ??? ?????? ??????? ? ?????????? ??? ??? ?????? ??? ?????? ??? ?????????? ???
???? ??????????, ??????? ?? ??? ?????? ??? ?????????? ???????, ?????? ?? ???????
????????? ??? ??? ?????? ??? ??????????;»

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20 ?? ?? ?????? ??????, ?? ?????? ?????????? ??????, ???' ??????, ?? ?????????? ??

?? ?????? 2, ?????? 1, ??? ?????? ??????? ??? ???? ?????? ??? ? ?????? ?????? ???????????
????????? ??? ?????? ??? ?????? ?????? ???, ??? ?????? ??? ?????? ??? ?????? ???,
????? ??? ?????? ?????? ??? ??????.

21 ??????, ??? ?? ?????????? ??? ???? ?????? ?????????? ??? ??? ?????? ???
????????? ??? ???, ?????? ??? ?????????? ??? ???????????, ??? ?????? 2, ?????? ???
????????? ??? ??????, ??? ??? ?????? ?????? ??? ??????, ??? ?????????? ??? ?????? ???
????? ??? ??????, ??? ?????? 4, ?????????? 1, ?? «????????? ??? ???» ?????????? ???,
????? ??? ?????? ??????, ??? ?????? ?????? ?????????? ?????? ??? ?????? ??? ???
????????? ??? ?????? ?????? ??? ?????? (?. ?????????? ??? 26?? ?????? 1987, 235/85,
????????? ??? ?????? 1987, ?. 1471, ??? 6-? 12?? ?????? 2000,
C?260/98, ?????? ??? ?????? 2000, ?. I?6537, ??? 24, ??? ??? 12??
????????? 2009, C?154/08, ?????? ??? ?????? ??? ?????? ??? ?????? ??? ???
??????, ??? 87).

22 ?????? ?? ??? ?????? ??? ?????? 4, ?????????? 2, ??? ?????? ??????, ?????? ???
????????? ??? ?????????? ??? ?????????? ??? ?? ?????????? ??? ?????? ???
??? ?????? ? ??? ?????? ?????? (?. ?????????? ??? ?????? ??? ?????? ???
????? ???, ??? 7, ?????? ??? ??????, ??? 25, ??? ?????? ??? ?????? ???
88).

23 ? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ???
????????? ? ?????? ??? ?????????? ?????????? ??? ??? ?????????? ???
???, ?? ?? ??? ? ?????????? ??? ?????? ??????, ?????????? ??? ??????
??? ?????????? ??? (?. ?????????? ??? ?????? ??? ?????? ???
8, ?????? ??? ??????, ??? 26, ??? ?????? ??? ?????? ???
????? 89).

24 ?????? ??? ?????? ??? ?????? ?????? ??? ???, ?????????? ? ?????????? ???
??????, ??? ? Astra Zeneca, ?????? ??? ?????? ?????? ??? ??? ???
????? ???, ?? ?? ??? ??? ?????? ?????? ?????? ??? ?????? ???
??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ???

25 ?? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????????? ???
????????? ??? ?????? ?????? ?????????? ?? ?????? ?????? ?????????? ???
?? ?????????? ??? ??????????, ?? ??????, ??? ?????????? ? ?????? ???
?? ?????? 31 ??? ?????? ???, ?? ?? ??? ?????? ?? ?????? ???
????????? ??? ?? ??? ?? ?????????? ??? ?????? ???
????????? ???.

26 ??? ??????, ??? ?????? ??? ?? ??? ?????? ?????? ??? ?????????? ???
?????? ?????? ???, ? ?????? ??? ??????, ??? ?????? ???
«????????? ???» ??? ??? ?????? ??? ?????? 5, ?????????? 1, ??? ?????? ???,
???? «????? ???» ??? ??? ?????? ??? ?????? 6, ?????????? 1, ??? ?????? ???,
????????? ???, ??? ??? ?????? ??? ?????? ???, ??? ?????? ???
????????? ???, ??? ??? ?????? ??? ?????? 5, ?????????? ?? ?????? ???.

27 ?????????? ?? ?????????? ?? ?????? ?????????? ??? ? ?????? ???
????????? ??? ?????? ??? ?????? ?????????? ?? ?????? ???, ?????????? ???,
????? ??? ?????? ???, ? ??? ?? ??? 2, ??? 1, ??? ?????? ?????? ???
????????? ??? ?????? ??? ?????? ??? «????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? 8?? ?????? 1988, 102/86, Apple and Pear Development Council, ?????? 1988,
. 1443, ??? 12-? 16?? ?????? 1997, C?258/95, Fillibeck, ?????? 1997, ?. I?5577,

????? 12- ??????? ????? ??????, ??????????????, ??? 29, ??? ?????? ????? ???? ??????, ??????????????, ??? 92).

28 ?????? ??? ?????? ?????? ????????, ? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?
??? ??? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ???
????. ? ?????????? ??? ?????? ??????, ??????, ??? ?????????? ???, ?????? ?????? ???
????????? ??????????, ??? ??? ?????? ?????????? ??? ?????? ?????????? ?????? ?????????? ?????? .
????????? ?, ??? ? ?????????? ?????? ?? ?????? ?? ?????? ?? ?????? ?? ?????? ?? ?????? (?.
????????? ?????? Fillibeck, ?????? 13 ??? 14 ??? ?????? ?????????? ??????????).

29 ??????, ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ?????????? ?
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? Astra
Zeneca ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ?? ??????????, ?? ?????? ?????????? ??? ??? ?????? ??? ?????? ??? ?????? ???, ??????
????? ???.

30 ??????????, ??? ?? ?????????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ?? ??????, ??
????????? ??? Astra Zeneca ??? ?????? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?????????, ??? ??? ?????? ??? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ???.

31 ??????, ??? ?????????? ??? ? Astra Zeneca ?????????? ?????? ?????????? ??????????
??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ?? ??????, ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? ?? ???.

32 ??????, ??? ?????????? ??? ?' ?????????? ??????, ? ??? ??? ??????
??? ?????? ??? ?? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? /? ???
????????? ??? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? Astra Zeneca ?????? ?????? ??? ?????? ?????? ???, ?????? ??? ?????? ??? ?????? ??? ?????? ???
?????????, ? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? ?????? ???, ?????????? ??? ? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? ??' ???.

33 ??????, ??? ?????? ? ?????? ?????? ??? ?????? ??? ?????? 45 ??? ??????
??, ??? ? ?????? ??? ?????? ?? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?? ?????? ??? ??????
?? ?????? ?? ??????, ?? ?????? ?????? ???, ??? ?????? ?????? ???, ??? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ???
??? ? ??? ??? ?? ??? ?????? ??? ?????? ???, ?????? ??? ?????? ??? ?????? ???, ??? ??????
??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ??? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

34 ??? ??? ?????? ???, ? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
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????? ??? ?????? 2, ??? ??? 1, ??? ??? ??????.

35 ??????, ??? ?????? ?????? ??? ? ?????? ? ?????? ??? ?????? ??? ? ?????? 2, ??? 1,
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36 ??????? ??? ?????????? ??? ?????? ??? ?????? ??????????, ?????????? ? ?????????? ???
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37 ?????????? ??? ? ??????? ?????????? ??? ?? ??? ?????? ?????????? ??? ?????? ???
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?? ??? 2, ??? 1, ??? ?????? ?????? 77/388/?? ??? ??????????, ??? 17? ???
1977, ??? ?????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
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10? ?????? 1995, ??? ??? ?????? ??? ? ?????? ?????????? ?????????? ???
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(?????????)

* ?????? ??????????: ? ??????.