

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

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

??? 18?? ??????? 2021 (*)

«????????????? ?????????? – ?????????? – ????? ?????? ?????? ?????????????????? ?????? (???) –
?????? 2006/112/?? – ????? 203 – ?????????? ?????????? ?????? ?? ?????????? – ??? ??????
??? ?????? ??? ?????????? – ?????????? ?????????? ?????????????? ?????? – ?????????? ???
?????? ?????? ?? ?????????? ?????????? ?????????? ?????????????? ??? ?????? ??? ????? ??????????
????????? ?? ?????????? ?????? – ????? ?? ?????????? ?????????????? ?????????????? ??? ???
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???? ??????? C?48/20,

? ? ?????????? ?????? ?????????????? ?????????? ??????? 267 ????, ???
?????? ?? Naczelnny S?d Administracyjny (?????? ?????????? ???????????, ???????) ??
?????? ?? 15?? ?????????? 2019, ? ????? ?????? ??? ?????????? ??? 28 ??????????
2020, ??? ?????? ??? ???

UAB «P.»

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Dyrektor Izby Skarbowej w B.,

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

????????? ??? ??? L. Bay Larsen, ?????? ???????, R. Silva de Lapuerta (??????????),
????????? ??? ???????????, ??? M. Safjan, ???????,

?????? ??????????: J. Kokott

?????????: A. Calot Escobar

?????? ??? ?????? ??? ??????? ????????????,

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

- ? UAB «P.», ?????????????? ??? ??? D. Kosacka, doradca podatkowy,
- ? ??????? ????????, ?????????????? ??? ??? B. Majczyna,
- ? ??????? ????????, ?????????????? ??? ??? N. Gossement ??? ??? J. Szczodrowski,
?????? ??? ??????? ??? ??????, ??? ?????? ?? ?????? ???????????, ?? ?????????? ???
?????? ??? ??????? ??? ????????,
- ?????? ??? ???????

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1 ? ??????? ?????????????? ?????????? ?????? ??? ??????? ??? ?????? 203 ??? ??????
2006/112/?? ??? ??????????, ??? 28?? ?????????? 2006, ??????? ?? ???? ?????? ??????
????????????? ??? (?? 2006, L 347, ?. 1), ????? ??? ??? ????? ??? ??????????????.

2 ? ??????? ?????????? ??? ??????? ??????? ??????? ??? UAB «P.» (???:
P.) ??? ??? Dyrektor Izby Skarbowej w B. (????????? ??? ?????????? ?????????? ??? B.,
??????), ??????? ?? ??? ??????? ?????????? ?????????? ?? ?????????? ???
????????????? ??? (???).

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

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

3 ?? ???? 203 ??? ?????? 2006/112 ?????? ?? ????:

«? ??? ?????????? ??? ?????????? ?????? ??? ?????????? ??? ?? ??? ???? ?? ?????? ??? ??????»

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

4 ?? ???? 108, ?????????? 1, ??? ustanowiona o podatku od towarów i usług (????? ??? ??
????? ??? ?????? ??? ??????????), ??? 11?? ?????? 2004 (Dz. U. ??? 2004, ????. 54, ???
535), ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ?????????? ??? ?????????? ??? ??????
????? (Dz. U. ??? 2016, ??? 710) (??? ????: ?????? ??? ???), ?????? ?? ????:

«????? ?????? ???????, ??????? ?????? ?????? ?????? ?????????????? ? ?????? ?????? ???????
????????? ??? ?????? ?????????? ???, ?????? ?????? ?????????? ??? ?????? ??? ?????? ??? ??????
?????»

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

5 ? P. ?????? ??????? ?? ??? ??? ??????????, ? ?????? ?????? ??? ?????????? ??????????????
????????????? ?????????? ?????? ?????????? ??? ?????????? ??? ?? ??? ?????????????? ??????????
?? ?????????? ?? ?????????????? ?? ?????????? ??? ?????????? ?????????? ?????????? ???
?????.

6 ? P., ?????????? ??? ? ??????? ?????????????? ??? ?????????? ??? ?????? ?????? ??????????
??? ??????? ?????????? ?????????? ?? ??? ??? ?????????? ??? ?????? ??? ??????????
????????????? ?????????, ??? ?????? ?????????, ?????? ?????? ?????????? ?????????? ??????????
????? ?? ??? ?????? ?????????? ?????????, ?????????? ??? ?????? ?????????? ??? ???.

7 ?? ?????? ??? 27?? ?????? 2014, ? Naczelnik Urzędu Skarbowego w Bielsku
(????????? ??? ?????????? ??? Bialystok, ??????) ?????????? ??? ??????
????? ??? P. ??? ??? ??? ?????? ??? ??? ?????? ??? ?????? ??? ?????????? ??? 2011, ???
????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
2011, ??? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? 108, ??????????
1, ??? ??? ??? ??? . ???????, ? ??? ??? ?????????? ?????? ??? ??? ?????? ??? ?????? ???
????????? ??? P. ?????????? ?????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? ?????????? ??? ??? ?????? ??? ?????? ??? ??? ?????? ??? ?????? ??? ?????? ???.

8 H P. ?????? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? Dyrektor Izby
Skarbowej w B. (????????? ??? ?????????? ??? B.).

9 ?? ?????? ??? 2?? ?????? 2014, ? ?????????? ??? ?????? ?????? ??? B.

?????? ??? ?? 27 ??????? 2014 ??????? ??? ?????????????? ??? ?????????????? ??? ?????????????? ???????????
??? Bia?ystok, ?? ?? ??????????? ??? ? ?? ??? ?????????????? ?????????? ??? ???
????????????? ??? ?????????????? ??? ?????????????? ??? ?????????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ????. ? ?????????? ?????????, ?????????, ??? ??? ?????? ???
?????????, ?????????? ??? ?????????? ?????????? ??? P. ??? ?????? ??? ???.

10 ?? ??? ?? 2 ??????? 2014 ??????? ???, ? ?????????? ??? ?????????????? ?????????????? ???????????
??? B. ??????????, ??? ??? ? ?????????? ??? ?????????? ??? ?????? ??? Bia?ystok, ??? ?
P. ??? ??? ?????? ??? ?????? ??? ?????????? ?????? ??? ?????? ??? ?????? ???'. ???, ??
????????? ?????????? ??? ?????? ??? ?????????? ?????? ??? ?????????? ?????? ?????????? ??????????
?????????, ?? ??????, ??? ??? ?????? ?????????? ??? ?????????? ??? P, ??????????????
??? ?????????? ??? ?????? ?????? ?????? ?????????, ?????? ??? ?????? ??? ?????? ??? ?????????? ???
?? ?????? ??? ???????. ? ?????????? ?????????? ??? P. ?????????, ???????, ??
?????????????, ??? ?????? ?????????, ??? ?????? ?????????? ??? ?? ??? ?????? ?????????? ??? ???
????????? ?????? ?????????? ???????. ? ?????????? ?????? ??? ?????? ?????????? ?????? ?????????? ???
????????? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ???.

11 ??????, ??? ??? ?? ?????????? ??? ?????? ? P. ??? ?????????????? ???
????????? ??? ?????? ?????????????? ??? ?????????????? ???, ? ?????????? ??? ??????????????
????????? ??? B. ?????????? ??? ?????? ??? ?????????? ?? ?????????????? ???
????????????? ??? ?????? ??? ?????? ?????? ?????????? ??? ??? ??? ??? ?????? ??? ???
????????????? ??? ?????? ??? ?????? ?????? ?????????. ??????, ?????????, ??? ?? ??????????
????????? ??? ?????? ? P. ??????????, ?????? ??? ?????? ???, ??????????
????????? ??? ?????????? ??? ??? ?????? ???.

12 ? P. ?????? ??????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????????????? ??????????
??? B. ?????? ??? Wojewódzki S?d Administracyjny we Bia?ymstoku (???????????)
????????? ??? ?????????? ??? Bia?ystok, ??????), ?? ?????, ?? ?????? ??? 7??
????????? 2015, ?????? ??? ?????? ???.

13 ? ?????????? ??? ?????????? ??? B. ?????? ?????? ??? ??? ?? ???
????????? ?????? ??? Naczelnego S?d Administracyjny (????????? ?????????? ??????????,
????????).

14 ?? ?????? ??? 17? ?????????? 2017, ?? ?? ??? ??????????, ??????, ?????????? ???
????????? ??? Wojewódzki S?d Administracyjny we Bia?ymstoku (???????????)
????????? ??? Bia?ystok) ??? 7? ?????? 2015, ?????????? ??? ?? ?????????? ???
????? ?? ????????, ?????? ??? ?????? ??? ?? ????????????, ?? ?? ?????????? ???
????? ?????? ?????? ??? ? ?????? ??? ?????????? ??? ?? P. ?????????? ???
????????? ?????????? ??? ?? ?????? ???, ???????, ?????? ??? ?????? ??? ?????? ???
?????????.

15 ?? ?????? ??? 19? ?????? 2017, ?? Wojewódzki S?d Administracyjny we Bia?ymstoku
(???????????) ?????????? ??? Bia?ystok) ?????? ??? ?????? ??? P.,
?? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?? ??????.

16 ? P. ?????? ?????? ??? ?????? ??? ?????????? ??? ?????? ?????? ??? ?????????? ???
????????? ??? ?????? ??? 6? ?????????? 2003, Auto Lease Holland (C?185/01,
EU:C:2003:73), ??? ??? 15? ??? 2019, Vega International Car Transport and Logistic
(C?235/18, EU:C:2019:412), ?? ?????????? ??? ?????????? ??? ? ??????????
????????? ??? P. ?????????? ??? ?????????? ???, ??? ?????? ?????????, ??? ??????
????????? ??? ?????? ?????????? ??? ?? ?????? ??? ?????? ??? ??, ??? ??????
????????? ??? ?????, ?? ?????????? ??? ???????, ?????????????? ???????, ?? ?????? ???.

?????????? ?? ??? ???? ??????.

17 ?? ?? ??? ?????????????? ??????????????, ??????????, ??? ?? ?????????????? ??? ?
????????????? ??? P. ??? ?? ?????????????????? ??? ?????? ?????? ? ??????????.
?????????????, ??????, ??? ?????? ??? ?????????? ? P., ?????????????? ?? ??????????
????? ?? ?????????? ??? ?????????? ?????? ?????????? ?? ?????????? ?????? ??????
??? ?????????? ??? ?????????? ?????? ?????? ?????? ?????? ?????? ?????? ???
???? ?????????????? ??? ?????????? ?????? ?????? ?????? ?????? ?????? ?????? ???
????????????? ?????? ?? ?????????? ??????, ?????? ?????? ??????, ??? ?? ?? ?? ???
????????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??????.

18 ???????????, ?? ?????? ?????????? ?????? ???, ?????? ?? ?????????? ??????, ? P.
?????? ?? ?????????? ?? ?????????? ???, ?????? ?? ?????? ?????? ??? ?? ???????
????????? ?? ?? ?? ?????????? ??? ?????????? ?????? ?????? ?????? ???????. ?? ???????
????? ?????? ??? P. ?????????? ??? ?????? ?????????? ? ??? ?? ?? ?? ?????? ???
????????? ?? ?????????? ??? ?????????? ??? ?????? ??????.

19 ?? ?? ??? ?????????? ?????????? ???, ??? ?????? ??? ? ?????? ???
????? ??? ?????? ??? ?????? ??? P. ?????? ?? ?????????? ??? ?? ?????? ???
????????? ?????????? ??? ?????? ?????????? ?? ?????????? ?????? ?????? ?, P.
????????? ?????? ?? ?????????? ??? ?????? ?????? ??? ?????? ?????? ??? ???
????? ?????????? ?? ?? ??? ?????? ?????? ??? ?????????? ?????????? ?????? ??????.

20 ?? ?????? ?????????? ?????????? ???, ?????? ?? ?? ? P. ?????????? ??????????,
????? ??? ???, ?? 2011, ?? ?????? ?? ?? ?????? ??? ?? ?????????? ??' ?????? ???
????????? ?????????? ???, ?????????? ??? ?? ?????? ???, ?? ?? ??????, ??????????
????? ?? ?????????? ??? ?????? ??? 108, ?????????? 1, ??? ?????? ??? ???, ??
????? ?????????? ??? ?????? ?????? ??? ?????? 203 ??? ?????? 2006/112.

21 ??????????, ??????, ???, ??? ?? ?????????? ??? ??????????, ?????????? ??
????????? ? ?????????? ???, ? ?????? ?????????? ??? ?????? ?????????? ??
????? ?? ??? ?? ?????????? ?????????? ??? ?????????? ??? ?????????? ???
????????? ???, ?????? ?? ?????????? ?????????? ??? ?????????? ??? ?? ?????????? ???
????? . ?????????? ??? ?? ?????????? ?????? ??? ?????????? ?????? ?????????? ???
????? ?????????? ?????? ??? ?????? ??? ?????????? ??, ?? ?????? ??????????
????????? ??? P. ??? ??? ?? ?????????? ??? ?????? ??? ?????? ??? ??????????
????????? ??? ?????????? ??? ?????? ??? ??' ?????? ??? ?????? ?????????? ???
?????????.

22 ??????, ?? ?????? ?????????? ?????????? ???, ?? ??? ?????????? ?????? ???
???? ?????????? ??? ?????? ??? ?????????? ???, ??? P. ??? ?? ??????????
????????? ???, ??? ?? ??? ?????? ?????????? ??? ?????? ??? P. ??? ?? ?? ???
????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ???, ??? ?????? ?? ?????? ??????
????????? ??? ?? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????????? ???
??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? P.

23 ??????, ??? ?? ?????????? ???, ? ??? ?????? ??? ?????? ??? ?????? ???
????????? ?? ?????? ??? ?????? ??? ?????????? ?????????? ??? ?????? ?? ??????????
?? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ???
????????? ???, ?????? ??? ?????? ??? ?????? ??? ?????? ??? P. ?????????? ???
????? ?????????? ?????? ??? ?? ??? ?????? ?????? ?????? ?????? ?????????? ???
?? ??????. ???????, ?? ?? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ??????
108 ??? ?????? ??? ??? ?????? ??? ?????? ??? P., ??? ? ?????? ??? ?????? ??

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

24 ??? ??? ??????? ??????, ?? Naczelnego S?d Administracyjnego (???????) ??????????
?????????) ?????????? ?? ?????????? ??? ??????? ??? ?????????? ??? ?? ?????????? ??
????????? ?? ??? ????? ?????????? ??????:

«????? ?? ??? 203 ??? [?????? 2006/112] ????? ??? ???? ??? ?????????????? ??
?????? ?? ?????????? ??? ???????, ?? ?????????? ??? ?????? ?? ?????? ?? ?????? ???,
?????? ??????? ?? ??? 108, ?????????? 1, ??? [????? ????] ?? ?????????? ??
????????? ?????????? ???, ??? ?????????? ??? ?? ?????? ?? ??? ?? ?????????? ???
????, ????:

– ? ?????????? ??? ?????????? ??? ?????? ??? ?????????? ?? ?????????? ???
????????? ?? ?????????? ??? ??????? ??? ?????? ??? ?????? ?? ?????? ?? ?????????? ???,
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????????? ?? ?????????? ???
????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????????? ?? ?????????? ???,
??? ?????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????????? ???
????????? ??? ?????? ???, ??? ????? ?????????? ?????? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ???, ??? ????? ?????????? ?????? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ???, ??? ?????? ??? ?????? ???, ??? ?????? ???, ???

– ? ?????????? ??? ?????????? ?? ??? ?????????? ?? ??? ?????????? ?????????? ??
????????? ?? ?????? ??? ?????????? ??? ?????? ??? ?????? ?? ?????????? ??? ?????? ?????????? ???
????? ?? ??? ?????? ??? ?????? ???, ? ?????? ??? ?????????? ?????? ?????? ???
????? ???;»

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

25 ?? ?? ?????????? ???, ?? ?????? ?????????? ???, ???' ??????, ??
????????????? ?? ?? 203 ??? ?????? 2006/112 ?? ?? ?????? ??? ?????????????? ??
?? ?? ?????????? ?? ?? ?????? ??? ?????? ??? ?????? ??? ?????????? ?? ?????? ??
????? ?? ?????????? ?? ?????? ??? ?????? ?????? ??? ?????? ?? ?????? ?? ?????? ??
????????? ?????????? ???, ?? ?????????? ?????? ??? ?????? ??? ?????? ??
????????? ?? ???, ??? ?????? ??? ?? ?????????? ??? ?????????? ??? ?????? ??
????????? ??? ?????? ?? ?? ?????? ??? ?????? ??? ?????????? ?? ?????? ??? ?????? ??
????? ??? ?????? ???.

26 ??? ?? 203 ??? ?????? 2006/112, ? ??? ?????????? ??? ?????????? ??
????????? ?? ?? ?????? ??? ?????? ?? ??????????. ??????, ?? ?????????? ??? ?????????????? ??
? ??? ?? ?????????? ?? ?????????? ??? ?????? ??? ?????? ??? ?? ?????? ??
????? ?? ??? ?????????? ??? ??? ?????? ?????????? ?????? ?????? (?????? ?? 8?)
????? 2019, EN.SA., C?712/17, EU:C:2019:374, ??? 26).

27 ?? ?????????? ??? ?????? ??? ???? ?????? ??? ?????? ?????? ??? ?????? ???
????????? ?????? ?????????? ??? ?????? ??? ?????? ?????????? ?? ?????????? ??
????????? (?????? ?? 11? 2013, Rusedespred, C?138/12, EU:C:2013:233, ???
24).

28 ??? ?????? ??? ?????? ?????????? ???, ?????? ?? ??? ?????? ??? ?????? ???
????????? ??? ?? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???
??????, ?? ?????? ??? ?????? ??? ?????? ?? ?????? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???
????? ?? ?????????? ??? ?????? ???, ? ??? ?????? ?????? ??? ?????? ???

?????? ??????????? ??? ?? ???? ?????????? ?? ?? ??????? ?????????? ??? ?????? (???????)
??? 11?? ??????? 2013, Rusedespred, C?138/12, EU:C:2013:233, ??????? 28 ??? 29 ???
???? ?????????????? ??????????).

29 ??? ????? ??? ??? ??? ?????????????? ??? ???, ? ??? ????? ????? ?????????? ??? ?????
????????? ??? ?????????????? ??? ????? ??? ?? ?????? ??? ??? ?????? ??? ?????????? ???
????????????? ??? . ???????, ?? ??????? ??? ?????????? ??? ?????? ?????? ?????????? ???
???? ?? ?????????? ?????????? ??? ????? ??? ?????????? ?????????????? ?????, ?????????? ???
?????? ? ??? ?????????? ???, ??? ??? ?????????? ??? ?? ??? ??? ?????????? ???
????????? ???' ????? ??? ??? (???????) ??? 2?? ??????? 2020, Terracult, C?835/18,
EU:C:2020:520, ??? 25 ??? ??? ?????????? ??????????).

30 ??? ????? ?????? ?????????? ??? ?????????? ??? ?? ?????????? ?????????? ??? ?????
???, ?? ?????????? ??? ????? ??? ? ?????? 2006/112 ??? ?????????? ??? ?????
??? ?? ?????????? ??? ?????????? ???, ?? ?????? ??? ?????? ??? ?????????? ???, ??? ??? ???
???? ?????????? ?????????? ??? ?????????? ??? ???, ??? ??? ?????????? ???, ??? ???
???? ?????????? ???' ????? ?? ?????????? ??? ?????????? ??? ?????????? ??? ???
????????? ? ?????????? ??? ?????????? ?????????? ?? ?????????? ??? (???????) ???
2?? ??????? 2020, Terracult, C?835/18, EU:C:2020:520, ??? 26 ??? ??? ?????????? ???
?????????).

31 ??? ?????????? ??? ?????????? ???, ??? ?????? ??? ?????????? ??? ??
??????????, ??? ?????????? ??? ?????? ???, ?? ?????????? ?????????? ??? ???
??? ??? ?????????? ?????????? ??? ?????? ???, ?????? ? ?????? ??? ??????????
?????????? ??? ??? ?????? ??? (???????) ??? 2?? ??????? 2020, Terracult, C?835/18,
EU:C:2020:520, ??? 27 ??? ??? ?????????? ??????????).

32 ? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?? ?????????? ??? ?????? ??? ?????? ?
???? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ???, ?????? ??? ?????? ??? ? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ?? ?????????? ??? ? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ??? ?????? ??? ? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ? ?????? ??? ?????? ???, ?????? ?????? ???
????????? ?????? ??? ?????? ???.

33 ??? ??? ?????? ??? ?????????? ??? ?????? ???, ??????? ?? ?????????? ???
??????????, ???' ????, ?????????? ?????????? ??? ??? ??? ?????????? ??? ?????????? ???
????????? ??? ?????? ??? ?????????? ??? ?????? ???, ? ?????????? ??? ??? ???
????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????????? ???.

34 ??? ?????? ???, ?????????? ??? ? ?????? ??? ?????? ??? ?????? ??? ??????????
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ???, ??? ?? ?????? ??? ?????? ??? ?????? ??? ?? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ??? ?????? ??? ?? ???, ?????????? ??? ?? ?????? ???
????????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ???
????????? ??? ??? ???.

35 ??? ??? ?????? ???, ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?? ??? 203 ??? ?????? 2006/112 ??? ?? ?????? ??? ?????????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ?? ?????? ??? ?????? ??? ?????? ??? ?? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
???, ??? ??? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???

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

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

36 ?????????? ?? ? ??????? ?????????? ?? ?????? ?? ?????? ????? ?????????? ?? ?????? ???.
?? ?????????? ?????????????? ?? ?????? ?????? ?????? ?? ?????? ?????? ??????????????, ?' ???.
????????? ?? ?????? ?? ?????? ?????? ?? ?????? ?????? ??????. ?? ?????? ?? ?????? ?????? ???????.
????? ?????? ?????????? ?? ?????? ?????? ??????, ??? ?????? ?? ?????? ?????? ??????, ??? ???????.

??? ??? ?????? ??????, ?? ?????????? (????? ????) ??????????:

? ? ?????? 203 ?? ?????? 2006/112/? ? ? ??????????, ?? 28?? ?????????? 2006,
?????? ?? ?? ?????? ?????? ?????? ?????? ?????????????? ?????, ??? ?? ?????? ???.
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