

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

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

TAMARA ?APETA

??? 24?? ??????????? 2022 (1)

?????? C?637/20

Skatteverket

????

DSAB Destination Stockholm AB

[?????? ?? Högsta förvaltningsdomstolen (?????? ?? ??????????? ????????????, ????) ???
?? ?????? ??????????? ??????]

«?????????? ????? – ??? ?????????????? ????? (??) – ?????? 2006/112/?? –
?????? ??????????? ??? ????? – City card – ?????? (??) 2016/1065 – ?????? ???
“?????????”»

I. ????????

1. ?? ??????? ?????? ??????? ??????? ??????? ?????? ?? ?????? ?? ?????? ??????? ??????? ???????
????? ?? ?????? (?? ????????, ?? ??????? ?????? ?? ?????? ?? ?????????????? ?????? ??
?????? ?? ?????????????? ?? ?????? ?????????? ?????? ?????? ?? ?????????? ?????? [outlets]). ??????,
????????? ? ?????? ?????? ?????? ?????? ?????? ?????? ?? ?????????? ?????? ?????????? ?? ??????????
????? ?????????? ?????????? ?????? ?????? ?????? ?? ?????????????? ?????? ??? ?????? ??? (2).
?? ?? ??????, ?? 2016 ? ?????????? ??? ?????? ?????????? ?????????????? (3) ??? ??????
2006/112/?? (?? ????: ?????? ??? ??? ???) (4) ?? ?????? ?? ?????????????? ??? ?????????? ???
??? ?? ?????? (5). ??? ?????? ??????, ?? ?????????? ?????? ?? ?????????? ?? ??????????
????????????? ??? ?? ?????? ?????????? ??????????????.

2. ?? ??? ?????? ?????????????? ???????????, ?? Högsta förvaltningsdomstolen (??????
?????????? ????????, ??????) ?????? ?????????????? ?????? ?? ??? ?????? ??
«?????????» ??? ?? ????? 30? ??? ?????? ??? ????. ?? ?????????????? ??? ?? ??????????
????????????? ?? ?????? ?????????? ?? ?????? ?????? ?????? ?? ?????? ?? ??????????
????????????? ??? ?????????? ?????? ??? ?????????? ?????? ?????? ?????????? ??? ?? ??????????
????????????? (?? ????: ?????????? ???, ?????? ? city card).

II. ?? ??????? ???????

3. ? ??? ???? ?????? 77/388/??? ??? ?????????? (6) ??????????? ?? ??? ?????? ??? ??? ???
??? 1? ?????????? 2007.

4. ?? ?????? ?????????? ??? ?????? ??? ??? ?????????? ??? ?????? 2, ??????????
1, ??? ?????? ????. ??? ???? 2, ?????????? 1, ????????, ??? ?????? ???
???, ?????????? ?? ??? «?? ?????? ?????????? ??? ?????????????????? ?? ?????????? ???
??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ???
??? ?????? ???».

5. ?????? ?? ?? ??? 14, ?????????? 1, ??? ?????? ??? ??, ?? «?????»
?????» ?????? «? ?????????? ??? ?????????? ?? ?????????? ???, ?? ??????,
????? ???», ???, ?????? ??? ?????? 24, ?????????? 1, ??? ?????? ???, ?? «?????»
?????» ?????? «????? ??? ???? ??? ?????? ??? ?????? ???».

6. ?? ????? 30?, ?????????? 1, ??? ?????? ??? ??? ?????? ??? ?? «?????»
????? ??? ??? ??? ?????????? ??? ?????? ??? ?????? ??? ?? ?????????? ???
????? ??? ?????????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ?????????? ??? ?????????? ??? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???

7. ?? ????? 30?, ?????????? 2, ??? ?????? ??? ?????? ??? ?? «?????»
?????» ?????? ??? ??????, ??? ???? ?????? ??? ?????? ??? ?????? ?
????? ??? ?????? ??? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ??
????? 30?, ?????????? 3, ?????? ??? ?? «????? ?????? ??? ?????? ???»
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???

8. ?? ????? 30?, ?????????? 2, ??? ?????? ??? ??? ?????? ??? ?? ??????????
????? ??? ?????? ? ? ?????????? ??? ?????? ??? ?????? ?????? ??????????
????? ??? ?????? ??? ?????? ?? ?????? 2, ??? ??? ?????????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?? 30?, ?????????? 2, ??????
?????, ?????? ??? «????? ??? ?????? ?????? ??? ?????? ?????????? ??? ???
????? ?????? ??? ?????? ?????? ??? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ?????????? ???
????? ?????? ??? ?????? ??? ?????? ???, ??? ?. ?????? ??? ?????? ??? ?????? ???
????? ???, ?????? ??? ».

9. ??? ? ???? 73 ??? ?????? ??? ??? ???, ? ??? ?????? ??? ?????? ??? ???
????? ??? ?????? ??? ??? ?????? ?????? ?????? ?????? ?????? ?????? ???
????? ???, ??? ?????? ??? ? ?????? ??? ?????? ??? ?????? ??? ?????? ???
? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ??? ?????? ? ?????? ??????,
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???

10. ?? ?????? 73? ??? ??????? ?????? ?????? ???, ?? ??? ?????????? ??? ?????? 73, ?
????????????? ??? ?????? ?????????? ?????? ? ??? ?????? ?????????? ??? ??????????????????
????????? ?????????? ?????????? ?????? ?? ?????? ??? ?? ?????????? ??? ?????????? ??? ??
????????? ??? ?? ?????? ?, ?????? ?????? ?????? ?? ?????? ??? ?? ?????? ?????????? ??? ??
?? ?????????? ??? ?? ?????? ?????? ?????? ?? ?????? ??? ?????? ?????????? ?????? ??? ??
?????????, ?????? ??? ?? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ??
????????? ?????? ??????.

11. ?? ?????? 30?, 30? ??? 73? ??? ??????? ??? ??? ?????????? ?? ??? ?????? 2016. ??
????????? ?????????? ?????????? ??? ?? ?????? ?????? ?????? ?? ???:

«(1) [? ?????? ??? ???] ?????????? ?????? ?????? ?? ??? ?????? ??? ??? ??
????????? ?????? ?????? ?????? ??????????, ?? ?????????? ???, ?? ?????????? ??? ??
????????????? ?????? (???) ??? ?? ?????? ??????. ??????, ?? ?? ??? ?????? ??? ??
????? ?????? ?????? ?? ?????? ??? ?? ?????????? ?????? ?????? ??? ?????? ?????? ???
????????? ??? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?? ??????????
????????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?? ?????????? ???.

(2) ??? ?? ?????????? ??? ?????? ??? ?????????? ??????????????, ?? ?????????????? ?
????????? ??? ?????? ??? ?????? ?????? ?????? ?????????? ?????? ?????????? ??? ??
????? ??? ?????? ??? ?????? ??????, ?? ?????????? ?? ??????????, ? ?????????? ???
?????????????, ? ?????? ?????????? ? ?? ?????????? ??? ?? ?????????? ? ?????? ???
?????????????, ?????????? ?????? ?????? ??? ?? ?????????? ??? ?? ?????????? ??? ??
??? ?????????? ??? ?????? ???.

(3) ?????????? ??? ??? ?????? ?????? ??? ??? ?????? ??????????????????,
????????????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?? ??? 1?
????????? 2015, ?????? ?? ?????? ?????? ??? ?? ?????? ?????? ?????? ??? ??
????????? ?????????? ?????? ?? ?????? ??? ?????? ?????? ??? ?????? ??? ??
?????. ??? ?????, ?????????? ?????? ??? ?????? ??? ?????? ??? ?? ?????????? ??? ??
??? ?????????? ??? ?????? ??? ?????? ???.

(4) ?? ?? ??? ?????? ?????? ??? ?????? ?? ?????? ??? ?? ?????????????? ???
????????? ??? ?????? ?????? ?????? ? ?????? ?????? ??????. ??????, ?? ?????? ??? ??
?? ?????? ?? ?????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ??
??? ?????? ?????? ? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?? ?????? ??? ??
????????? ???.

(5) ?? ?????????? ??? ?????? ?? ?????? ??? ?? ?????? ?? ?????????? ?? ??? ?????? ???
????? ??? ?????? ??? ?????????? ??? ?????? ??? ?? ?????? ??? ?????? ?????? ???,
????????? ??? ?????? ?? ?????? ?????????? ??? ??????, ??? ?????????? ??? ??
?????????.

(6) ??? ?? ?????????? ??? ?????? ?? ?????? ??? ?? ?????? ??? ?????? ??? ??
????????? ??? ?????? ??? ?? ?????? ??? ?????? ??????, ?????? ?????? ?? ?????? ??? ??
?? ?? ?????? ??? ?????? ?? ?????? ?????? ?????? ??????, ??? ?????? ??? ??
????????? ?? ?????? ?????????? ??? ?????, ?????? ?? ?????? ??? ?????? ?????? ???
????????? ?? ?????? ??? ?????? ?????? ?????? ??? ?? ?????????? ??? ??
????????? ??? ?????? ??? ?????? ??????.

III. ?????????? ??????????, ?????????? ?????? ???, ?????????? ?????? ???
????????? ??? ?????? ??? ?????? ??????

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

20. ???????, ? DSAB Destination Stockholm ??????????? ??? ? ?????? ??????? ???????
?????? ?? ?????? ????? ??????????? ?? ??? ??????????? ?? ???????.

21. ?? ?????? ??????????? ???????????, ??????, ??? ?? ?????????? ??? ?????? ??????? ???
?????? ??? ?? ??? ????? ?????? ??????? ??? ??????? ??? ??????? ??? ??????? ???
???? ?? 31 ?????????? 2018 (7). ???????, ?????????? ??? ?? ?????? ??? ?? ?????? ??
????????????? ?? «city cards» ??????? ?????????? ?????????? ??? ??????? ???
????????? ??? ?? ?????? (8), ??? ?? ??? ?????? ?????????? ?????????? ?? ??????? ??
????? ??? (9). ?????, ?? ?????? ?????????? ?????????? ??? ?? ?????????? ??? ??
????? ?????? ?? ?????????? ??? ?? ?????????? ??? ?? ?????? ??? ?? ?????? «??????»
?? «?????? ?????????? ??????».

22. ??? ?? ?????? ?? Högsta förvaltningsdomstolen (?????? ??????????
?????????) ?????????? ?? ?????????? ??? ??????? ??? ?????????? ??? ?? ?????????? ??
????????? ?? ?????????? ?????????? ??????:

«???? ?? ??? 30? ??? ?????? ??? ?? ??? ?????? ??? ?? ?????? ??? ?? ?????? ??? ?
????? ???, ? ?????? ?????? ??? ?? ?????? ??? ?? ?????? ??? ?? ?????? ??? ??
????????? ??? ?? ?????? ?????? ?????? ??? ?? ?????? ??? ?? ?????? ??? ??
????????? ??? ?? ?????? ??? ?? ?????? ???, ??? ?? ?????? ?????? ???, ?????? ?????? ???;»

23. ?????? ?????????? ?????????? ??? ?????????? ? DSAB Destination Stockholm, ?
Skatteverket (????????? ???), ? ?????? ?????????? ??? ? ?????????? ??????.

IV. ??????

24. ?? ?????? ?????????? ???????????, ???' ????, ??? ?????? ?? ?????????? ? ???
«?????», ? ?????? ?????????? ??? ?????? ??? ?? ?????? ??? ?? ?????? ??? ??
????????? ??? ?? ?????? ??? ?????? ?????? ?????????? ?? ?????? ?????????? ??
?? ?????????? ?????? ?? ?? ?? ? «city card» ??? ?? ??? ?????? ??? ?????????? ???
????? ?????????? ??? ?????????? ?????? ??????. ??? ?? ?????? ??? ?????? ?????????? ???,
????? ?????????? ??? ?????? ?? ?????????? ???, ???????, ? ?????? ??? «??????»
????????? ??????».

25. ?????????? ?? ??????? ??? ?????????? ???, ?????? ?? ?????????? ?? ???.
??????, ?????????? ?? ??????? ??? ?? ??? ?????? ??? ?????? ?????????? ???' ????, ??
?? ?????? ?? ??????? ??? ?????????? ??? «city cards» ??? ?? ??? ?????? ??? ??, ???
?? ?? ?????? ?? ??????? ??? 2016. ??? ??????? ?? ?????? ?? ?????? ?????? ??? ??
????? ?????? ?? ?????????? ?? ?? ?????????? ??? ?????????? ??? ?? «?????». ???,
?? ?????? ?? ??????? ??? ?? «city cards» ??????? ??? ?????? ??? «?????» ??? ??
????? ??? ??.

? . ? ?????????? ??? «city cards» ??? ?????? ??? ?????? ??? ?????? ??? 2016

26. ?????? ?? ?????????? ?????????? ?????? ?? ?????????? ?????????? ?? ???
????????? ??? «city cards» ??? ?????? ???, ??? ?? ?????? ??? ?? ?????? ??? ??
????? ??? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?? ?????? ??? ?????? ??? ??
????? ??? ??? ?????????? ??? ?????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ??
????? ??? ?????? ??? ?????? ???, ??? ?????????? ??? ?? ?????? ??? ?????? ??? (10) ??? ??

?????????? ??? ???????? ??? (11), ?????????? ??? ?? ?????? ??? ?????? ??? ?????? ??????????????
?? ?????????????? ??????.

27. ??????? ?? ??? ??????? ??? ?????????? ??? (12), ?? «city cards» ??????????????????
?? ??????? ??? ?? ?????? ?????? ?????? ??????. ? ?????? ?????? ? ?????? ??? «city cards» ??
?? ??? . ? ?????? ?????? ??? ?????????? ?????? ??? ??? ?????? ??? ??????
????????????? ?????? ??? ?????? 13, ?, ????????, ??, ?????? ????????, ??? ?????? ??????
(?? ?????? 135, ?????????? 1, ????????, ??, ??? ?????? ??? ??? ???), ??????????????
?? ?????????? ?????? . ? ?????? ?????? ??? ?????? ?????? ??? ??? ?????? ??????????????
??????, ??? ?????? ??? ?????? 13, ?, ????????, ??, ?????? ????????, ??? ?????? ??? ??????
?????? (?? ?????? 135, ?????????? 1, ????????, ??, ??? ?????? ??? ??? ???), ?? ??????
????? ??? ?????? ?????? ??????, ?????? ??? ?????? ?? ?????? ?????????????? ??? ??????
?????? ??? «city cards» ?? ?????? ?????? ? ?? ?????? ????????, ?????? ??? ???????,
?????? ??? ?????? 13, ?, ????????, ??, ??? ?????? ?????? (?? ?????? 137, ?????????? 1,
??????, ??, ??? ?????? ??? ??? ???), ?? ?????? ?????? ?????? ?????????????? ??? ?????? ??
????????? ?????? ??? ?? ?????? ?????? ?????????????? ?????? ??? (13).

28. ?? ?? ??????, ? ??????, ?????????? ??? ?? ?????????? ?????? ?? ?????????? ??????????
?? ?????? ?????????? ??? ?????????? ??? ??????????, ?????? ??? ?????? ?? ??????
????? ?????????? ??? «city cards» ??? ?????? ??? (14). ?? ?????????? ??? ??? ??????
«?????».

29. ????? ?? ??????? ????????, ??? ?????? ?? ?????????? ?????? «???????
?????????», ?? ??????? ?? ?? «city card» ?????? ?????????? ??? ??? . ? ?????? ???
«city card» ?? ?????? ?? ?????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ??????????,,
????? ?? ??? ??????, ?????? ?????????? ??? ?????? (15). ??? ?????????? ???
????????? ?????? ??? ?????? ?????????? ??? ??? . ??? ?? ?????????? ??? ??????????
????????? (16) ?????????? ??? ?? «city cards» ?????? ?????? ?????????????? ???
??? ?? ??? ?? ?????????? ??? ?????? ??? 2016 (17). ??? ?? ?????? ??? ?????????? ???
????????? ??? ??? ?? ?????????? ??? ?????? ??? ?? «city cards» ?????????????? ??? ???
????? ??? (18).

30. ??? ?????? ??? ?????? ????????, ??? ?????? ?? ?????????? ?????? ?? ??? ??
«????????? ??????», ?? ??????? ?? ?? «city card» ?????? ?????????? ??? ??? . ??? ??
?? ?? ?????? ???????, ? ??? ?????????? ??? ??? ?????? ??? «city card» ??? ?? ??? ??
??? ??????. ??????, ?? ?????????? ??? ??? ?????? ??? ?????? ?????????? ??? ???
??????, ??? ?????? ?? ?????????? ??? ?????? ?????????? ??? ?????? ??? ??????????
????????? ??? ?????????? ??? ??? ?????? ?????????? ??? ?????? ??? ??????????
????? (19). ??????????, ??? ?? ?????? ??? ??????, ? ?????????? ??? ??? ??????
????????? ??? ?????????? ??? ??? ?????? ?????????? ??? ?????? ??? ??????????
??? ?? ?????????? ??? ??????. ? ??? ?????????? ??? ?????? ??? ?????????? ??? ???
????????? ?????? ??? ?????? ??? ?????? ?????????? ??? ??? ?????? ??? ??? ???
????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ??? ???.

31. ??? ?? ?????? ?????????? ??? ?? «city cards» ?????? ?????????????? ??? ?????? ???
?? ?????????? ??? ?????? ?????????????? ??? ??????.

32. ??? ?? ???????????, ??? ?? «city cards» ?????????????? ?? ???????, ??? ??
????? ??????? ?? ??? ?? «????????? ??????» ?????? ?????????? ?? ?????????? ??????????
????????? ??? ??? «city cards», ?????????? ?? ?????? ??? ?????????? ??? ??????????
????????? ??????. ? ??? ?????? ?????? («?????» ??? ??? ???), ? ?????? ?????????? ??? «city
cards» ?? ??? ???????, ?? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? 2016, ?? ???

?????, ??????? ?? ?? ??????????? ?????? 6 ?????, ??????????? ?? ?????????????? ??????? ??
?? ??????? ?? ?? ??? ?????? (20). ? ?????? ?????? («????? ??????») ??? ??
???? ??????? ?? ?? ?????????? ?????? ?????????? ??? ?????????? ??? ?????????, ?????????? ???
???? ?????? ?????????? ??? ?????? ?????????? ?????? ?????? ?????? ?????? ??????. ????????
????????? ??? ?????????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????
????????? ?????? ?????? ?????? ?????? ?????????? ??? ?????????? ?????? ?????? ?????? ???
????? ?????? ?????????? ??? ??? (??? ?????????? ? ?????? ??? ??????). ?? ??
??????, ?? ?? ??? ?????? ?????? ??? ?????????? ?? ??? ?????? ?????? ?????? ??? ?? ?????? ???
?????? ??? 2016, ? ?????? ?????? ??? ?????? ??? ?????? ?????????? ??? ?? ?????? ??? ?? ??????????
????? ??? ?????????? ??? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ????. ? ?????? ???
«????????? ??????» ?????????? ?????????? ?? ?????? ?????????, ?????????? ? ?????????? ???
????? ??? ??? ??????????. ??????, ?? ?????? ??????, ?? ?????????? ?????? ??? ??????
????????????? ?? ?? ?? ??? ?????? ?????????? ?????? ?????????? ??? ?? ?????????? ??? ??
????? ?????? ??? ?????????? ??? ?????? ?????????? ??? ?????? ?????????, ?? ?????? ?????, ?? ??
????????????? (21).

? ?????? ??? 2016

33. ??? ?????? ??? ?????????? ???????, ? ?????? ??? ???????, ??? ??????
?? ?????? ?? ?????? ?????????? ??? ?? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ???
?? ?????? ???????????, ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? (22). ?? ??
??????, ??????? ?????????? ? ?????? ??? ?????? ??? ?????? ??? ?????? ?????????? ??? ?????? ???
2016, ?????? ??? ??? ?????????? ??? ?????? ?????? ??? ?????????? ??? ?????????? ??? ??????
??? ???????.

1. ? ?????? ??? ? ??? ?????? 2016

34. ?? ??????? ??? ?????????? ?????? ?????? ?????? ?????? ?????? ??? ?? ?????????? ??? ??????
?? ?????? ?????? ? ?????????? ?????? ?????? ?????? ?????? ?????? ?????????? ??? ?????? ??????
?????? ??????. ? ?????????? ?????? 1 ??? ?????? ??? 2016 ?????? ??? ? ?????? ??? ??
????? ?????????? ?? ?????????? ?????? ?????? ?????? ?????? ?? ??? ?????? ??? ?????? ??? ??
????????? ?????? ??? ?? ?????? ?, ? ?????????? ?????? ??? ?????????? ??? ?????????? ??? ??
????????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????????? ??? ?????????? ??? ??
????????? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????????? ??? ?????????? ??? ?????? ??? ??
????????? ?????? 2 ??? 3, ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??
????????? ??? ?????? ??? ?????????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??
????????? ??? ?????? ??? ?????????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??,
??????, ?? ? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??,
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??,
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??.

35. ??? ???????, ??? ??????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????? ??? ??
?????? ?????? ???, ?????? ?????????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????? ???
??? ?? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??
??? (23). ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ??
????????? ??? «????? ??????» ??? ?????????? ??? ???????.

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

37. ?????????? ?? ?????????? ?? ?????????? ?? ?????????? ?? ?????? ?? ?????????, ? ?????? ??? 2016
????????? ?? ?? 30?, 30? ??? 73? ?? ?????? ?????? ?? ??? ?? ?? . ?? ?????? ???
????? ?????????????? ?? ??? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ???
??? ?????????? ??? ?????? ??? ?????? ??? ?? ?? ??? ????? ?????????? ?????????? ?????? ???
????????? ??? ?????????? ??? ?? ??? ?????? ??? ?????? ?????? ?????????? ??? ?????? ???
????????? ??? ??????.

38. ?? ????? 30? ??? 30? ?????????????? ??? ?????? ??? ?????????? ??? ?? ?? ?? ??
????????? ??? ?????? ?? ??? «????????? ??????», ?? ??? ?????? 5, ?? ????? «??????
????????? ??? ?? ?????? 1 ??? 3». ?? ????? 73? ?????????? ??? ?????? ??? ?????
??? ?????????? ??? ?? «???? ?????? ??? ?????» . ?? ??? ????? ?????? ?????? ???
????????? «[?] ??? ?????? ??? ?????? 73». ??? ??????, ? ?????? ??? ?????? ???
????? ?? ?? ?????? ??????, ??? ?? ?????????? ?????? ?????? ??? ?????? ?? ?? ?????
????????? ???.

2. ?????????? ??? ?????????? ??? ?????? ??? ?? ??

39. ?? ????? 30?, ?????????? 1, ??? ?????? ??? ?? ?? ?????? ?? ??????? ?? ?? ?? ??
??? ?? ?????? ??????? ?????????? ??????? ?? ?? ?????????? ? ?????? ??????????????
??? ??????? ?????? ? ?????? ??????? ?? ?? ?????? ?????? ?????????? ?????????? ??
?? ?????? ?? ?? ??????? ?? ?? ?????? ?? ?????? ?????? ??????? ?? ?????????????? ??
????????? ?, ?????????? , ??? ?????????? ?????? ?? ?? ?????? ?????? ??????????.

40. ?????????? ??? ?????? ??? ?????????????? ??? ?? ?? ?? ?? ?? ??
????????? ?? ?????? (24). ??? ?????? ??? ?? «????????? ??????». ??
????????? ?????? ?????? ?? ?? ?????? ?? ?? ?????? ??? ?? ??, ??????
????????? ?????? ?????? ?????? ??? ?? ?? ?????? ??? 2016 (25). ??? ?????????? ???
????????? ??? 4 ??? ?????? ??? 2016, ? ?????? ?????? ??? ?????? ??? ?? ?? ??
????? ?? ?? ?? ?? ?????? ?????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?? ?? ??
????? ?? ????????, ??? ?? ?????? ?? ?????????????? ??? ?????? ??? ?? ?? ??
??? ??? ?? ?? ?????? ?????? ??? ?? ?????? ?? ?????? ?????? ??? ?????? ??? ?? ??
????????? ?? ?????? ??? ?? ?????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?? ??
????????? ?? ?????? ??? ?? ?????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?? ??
30? ??? ?????? ??? ?? ??.

41. ?? ??? ?????????? ??? ?????????? ??? ?? ?????? 30?, ?????????? 1, ??? ??????
??? ?? ??? ?????? ??????????.

42. ? ??? ?????? ?????????? ?????????? ??? ?? ?? ?? ?????? ?? ?????????????? ???
????????? ??? ?????????? ?????? ??? ?????? ?????? ?????? ?????? ?? ?? ?????????? ??
????????? ? ?????? ?????????? ??? ?? ?? ?????? ?????? ??? ?????? ?????? ??????.

43. ?? ??? ?????????? ??? ?????? ??? ?????????? ??? ??????????, ? DSAB Destination Stockholm
????????? ??? ?? ?????? ?????? ??? ?? ?????? ?????? ??? ?????? ?????? ??? ?????? ???
????????? ?????? ? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? . ??????????, ? ??????
????????? ?????? ?????? ??? ?? ?????? ?????? ?????? ?????? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?? ?????? ?????? ?????? ?????? ?????? ?????? , ?? ??????
????????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ??????.

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

44. ?????????? ?? ?????????? ?????? ??????? ? ?????????? ?????? ?? ?????????? ?????? ?? ?????? ?????? ???????????
????????? ??? ?????? ?????? ?????????? ??? ?????? ??????, ?? ?????????????????? ??? ??? ??
????????? ??????? ??? ??? ?????? ??? ?????? ??? ??????????. ??? ?????????? ??? ??????? ?????????? ??? ??
????? 30? ?????? ??? «[?]» “????????” ??????? ??? ??? ??? ??????? ?? ?????????? ??? ?????????? ???
????? ? ?????????? [...]» (26). ??????, ? ?????? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???
????????? ?????? ?????? ? ?????????? ?? ?????????? ??? ?????????? ?????????? ??? ?????????? ???, ??? ??????????
????????? ??? ?????????? ??? ?????????? ??? ?????????? ? ??? ?????????? ?? ?????????? ??? ?? ??? ??? ???
?? ?????????? (27). ?? ?? ??????, ?? ?????????? ??? ?????????? ?????????? ??? ?????????? ??? ??
????????? ?????? ?????? ? ?????????? ?????? ?????????? ?????? ?????????? ?????????? ??? ?????????? ???
????? ?? ?????? ???.

? . ?????????? ?????????? ??? «city cards»

48. ? ?????????? ??? ?????????? «city cards» (29) ??? ???????? ??? ??? ?? «city cards»
?????????? ?? ????????. ??????????, ??? ????? ?? ????? ??? ??????????. ????? ??
?????? ?? ??????? ?? ?????????? ?????????????? ??? ??????? 30? ??? ??????? ??? ?? ??
????? ??????? (30).

49. ???????, ??? ?? ?????? ?????????????? ?????????????? ??? ?????????????? ???
?????? ?????????? ??? ?????????? ??? ??????????, ?????????? ?????? ?? ?????? ???
?? «city cards» ??? ?????? ?????????? ??? ?????????? ??? ?????? ??? ??? ???? ???
????? ??????. ?? ??? ?????, ??????? ?????? ?????? ?????? ?????? ??? –?? ??? ?????
?? ?? ??????? ??? ?? ??????? ??????– ??? ?? ?????????? ??? ?? ?????????? ???
????? ??? ???, ?? ??????? ?????? ?????? ??????; ?????? ??? ?????? ???;

1. ?? «city cards» ?? ????????

50. ?????? ??? ?????????? ?? ??????? ?? ?????????? ??? ? ?????????? ??? «city cards»
?????????? ?? ?????????? ?? ?????????? ?? ?????????? ?? ?????? ? ?? ?????????? ?? ?????????? ??
?????????? ?? ?????????? ?? ?????? ?? ?????????? ?? ?????? ?? ?????????? ?? ?????????? ??, ??
????????? ?? ?????? ?? ?????? ?? ??????????. ?? ?????? ?? «city card» ?? ?? ??? ??

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

51. ??? ??????? ???, ????? ??? ???? ?????????? ?????? ?????? ?????? ??? ???? ???????
????? ??? ?????? ? ?????????????? ?????? ? ???? ?????? ?????????? ?????????????? ?? ????
??? ?????? ?? ?????????? ??? ?????? ??? ???? ???? ???? ?????????? ?????? ??? ???? ???? ?
????????? ?????? ??? ?????? ??? ???? ???? ?????? ?????? ?????? ?????? ??? ???? ???? ???? ?
?? ??? ?????? ?????? ?????? ?????? ?? ???? ???? ?????? ?????? ?????? ??? ???? ???? ???? ?
????? ?????????? ????. ?? ?? ??????, ? ?????? ?????? ??? ?????? ??? ???? ???? ???? ???? ?
????????? ?????????? ?? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? ??? ?????? (????? ??? ???? ???? ?????????? -?????? ???? ?????? - ?? ?????? ??? ?????? ???
????? ??? ?????? ??? ?????????? ??? ??????), ??? ?????????? ?? ?? «city card» ???
??? ??? ??? ??????????, ??? ?????? ?? ?????? ??? ?????? ??? ?????? ??????????, ?????? ?
????? ??? ?????? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ????.

52. ? ?????????? ??? ?????????? ??? ?????? ??? ???? ???? ???? ? «city card» ??? ???
??? ?????????? ??? ???? ???? ???? ???? ???? . ???????????, ???????????,
??????, ??? ???? ???? ?????????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ???
??? ?????? ???, ?? ?????????? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ?
????? ??? ??? ??? ??? ???, ???????, ??? ? ?????????? ?????? ?????? ?????? ?????? ?????? ??????
??? ?????????? ??? ??? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ????.

53. ??? ?????? ??? ?????? ???? ?????????? ??? ?????? ??? ???? ???? ???? ???? ???? ?
????????? ??? ?????? ?????? ?? ??? ???? ??????. ???' ??? ???, ? ?????? ??? ???? ???? ?
?? 2016 ??? ? ?????? ?????? ?????? ?????? ??? ?????? ?????? (31). ?? ?? ??????, ???
??? ?????? ??? ?????????? ??? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ?
??????, ???? ???? ???? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?
????????? ???, ? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?
????????? . ??? ??? ?????? ??? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ?
????????? ?? ?????????? ?? ??????, ?? ?????????????? ?????? ??? ???? ???? ???? ?
????????? ?? ?????????? . ?????, ????? ???? ?????? ??? ?????? ?????? ?????? ??? ???? ???? ?
????????? ?? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ??? ???? ???? ?
????. ???????, ?? ??? ? «city card» ??? ?????? ??? ?????? ?????? ?????? ??? ???? ???? ?
???? ?????? ??? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ?
?????????.

54. ? ?????? ?????? ??? ?????? ??? ???? ???? ???? ? «city card» ??? ???? ???? ?
????????? ?????????? ??? ???? ???? ? «city card» ??? ???? ???? ???? ???? ?
????????? , ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ?
????????? (?? ??????????, ?? ??????????, ? ???? ???? ???? ???? ???? ???? ???? ?
?????, ??? ???? ???? ???? ???? ???? ???? ????), ? ?????? ??? ???? ???? ???? ?
????????????? , ? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ?
????? ??? ?????? ??? ???? ???? ???? ???? ???? ???? ???? ???? ???? ???? ?
«city cards» ?????????? ??? ???? ? «city card» ??? ???? ???? ???? ???? ?
????????? ?????? ?????? ?????? ??? ?????? ?????? ?????? . ???????, ? ?????????? ???? ?
????????? ?????? ?????? ?????? (?? ???) ? ?????? ?????? ?????? ??? ???? ???? ???? ?
????????? . ???????, ??? ?????? ?????? ?????? ?????? ?????? ??? ???? ???? ???? ?
?? ?????? ?????? ?????? ?????? ??? ???? ???? ???? ???? ???? ???? ???? ???? ?

??? ??. H «city card» ??? ?????????? ??? ?????? ????. ??? ?? ??????? ??? ??????
????????? ?? ?????? ??? ?????? ??? ?????????? ??? ?????? ?????????? ??? ?????? ?????? «city
card», ? ?????? ??? ?? ?????? ?????????????? ??? ?????? ??????????, ??? ? ??????????????
????????????? ??? ?????? ??? ?????? (??? ??????????, ??? ?????? ??? ?? ??????????) ???
?? ??????????.

55. ?? ?? ??????, ?? ??? «city card» ?????? ??? ?????? ??? ?? ?????????? ?? ??
????????? ?? ?????????? ??? ?? ?????????? ??? ?? ?????? ?????????? ?? ?????? ?????????? ??
????????? ??? ?????? ???, ??? ?????????? ??? ?????????????? ??? ?????? ?? ?????????? ???
????????? ?? ?????????? ?? ?? ?????????? ?????????? ??? ?????? ??? ?????????? ???.

56. ??? ?????? ?? ?????????? ???????????, ? ?????? ?????????? ??? ?????? 30? ??? ??????
?? ??? ???, ??????? ?? ??? ?????? ?? ?????? ??? ?????? ?????????? ?? ?????? ?????????? ??
????????? ?? ?? ?????????? ??? ?????????? ?????????? ?????????? ?? ?????? ?? ?????? ??????, ?
????????? ??? ?????????? ?????????? ?????????? ??? ?????? ??? ? ?????? ?????? ??????????
????????? ??? ?????? ?????????? ?????????? ?????????? ?????? ??? ?????? ?????? ??????????
????????? ??? ?????? ?????????? ?????????? ?????????? ?????? ??? ?????? ?????? ??????????.

57. ????????, ? ?????????? ??? ?????? ?????????? ??? «city card» ??? ?????? ?? ??????
?? ?????? ???, ??? ?????? ?????????? ??? ?????? ?????????? ?????????? ???, ? ??????
????????? ??? ?????? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ?????????? ??
?? ??????, ??? ?????? ??? «?????????» ??? ?????? ??? ?????? ??? ?????? ?????????? ??? ??
????????? ?? ?????? ??? ?????????? ??? ?????? ??? ?????????? ?????????? ?? ?????? ?????????? ??? ??
?? ?????????? ?? ??????. ??? ?? ?????? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????????? ??? ?????? ??? ?????????? (??? ??????????, ?????????? ?????????????? ??? ??????
????????) ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????????
?????, ? ?????? ?????? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ??????
????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? (32). ??????????, ???
????????? ??? (33): ??? ?????? ??? ?????? ??? «?????????», ??? ?????????? ??? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????????? ??? ??????????, ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? 2016. ?????????? ??? ??? ??????????
????????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
????? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?????. ?? ?? ??????, ?? ??? ?????? ?????? ?????? ??? «city cards» ??? ?????? ???
????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ?????? ??? ?????? ??? «city card» ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ??? ?????? ???.

58. ? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ??????????????????
?? ??? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? (34) ??? ??? «city cards»
????????? (35). ? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? (36). ??????,
????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

59. ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ??????
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? 5 ??? ?????? ??? 2016 ??? ?????? ??? ?????? ??? «city cards» ??
????????? . ?? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???

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

60. ??? ???? ??? ???? ??? ?????? ??? ?????????????? ?????? ??? ?????????????? ??? ?
????????? ??? ?????????? ??????????, ?????????????? ? ?????????? ?????? ??? ??????????
??? ?? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?? ?????? ??????????
????????? ??? ??? ?????? ?????????? ??? ?????? ??? ?????????? ??? ?? ?????? ??????????
????????? (37). ?? ?????? ?????? ??? ?????? ??? ?????????? ?????????? ?????????? ???
????????? ??? ?????????? ??? ?????????? ??? ?????????? ?? ?????????? ??? ?????????? ??
?????????. ??? ?????????? ???' ?????????? ?????? ?? ?????????? ??? ?????????? ??
?? ??? ??????. ??? ??? ?????????? ?????????? ???, ?????? ??? ?????????? ??
??, ?????????? ??? ?? ?????????? ?????????, ??? ?????? ??? ?????????? ??
????? ?? ??????????.

61. ??? ?? ??? ???? ???, ? ??? ???? ??? ???? ??? ???? ???? ???? ???? ???? ???? ???? ?
????????? ??? ?????????? ??? ?????????? ??? ?????? ??? ???? ???? ???? ???? ???? ???? ?
?? ?????? ??? ?? ?????????? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ??????????
??? ?????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?
?????????. ??? ?? ?????????? ??? ?????????? ??? ?????? ??? ?????????? ???, ??? ??? «city card»,
?? ?????? ?????????? ???, ?????????? ??? ?????? ?????? ?????????? ?? ?????? ?? «?????????
?????», ? ?????????? ??? ?? ?????????? ??? ?? ?????????? ??? ?? ?????????? ??? ?????? ???
??? ?????? ??? ?? ?????????? ?? ?????? ?????????? ?????????? ??? ?????????? ??? ?????? ???
????????? ??? ?????????? ??? ?????????? ??? ?????? ??? ?????? ???.

62. ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ??????, ?????? ??? ??? «city card» ???
? ?????? ??? ?????? ??? ?????? ?????????? ?????? ?????? ?????? ??? ?????????? ???
????????? ??? ?????? 30? ??? ?????? ??? ??? ?????? ???, ??? ?????? ???, ??
????????? ?? ?????? ??? ?????? ???.

2. ?? «city cards» ?? «????????? ?????????? ??????»

63. ?? ?????? ?????????? ?????????? ??? ?? «city card» ??? ?????????? ?????? ???
????? ?????????? ??? ?????? ??? ?????? ?????? ???.

64. ?? ?????? 30? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ???
????? «????????? ???» ??? ?? ?????? «????????? ???». ?? «????????? ?????? ???
?????» ?????? ?? ?????? ??? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ???
«????????? ???».

65. ?????? ??? ?????? 30?, ?????????? 2, ??? ?????? ??? ??? ???, ?? «?????????
????????? ???» ?????? ??? ??????, ??? ???? ?????? ?????????? ??? ?????? ???
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

66. ??? ?????? ??? «city cards», ?, ??????????, ??? «city cards» ??? ?????? ???
????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ???,
????? ??? ?????? ??? ??????, ?? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???
????? ???????. ?? ?? ??????, ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ??? ?? ???????. ??? ??????, ??? ?????? «city card» ??? ?????? ???
????????? ??? ??????. ?????, ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???

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

3. ?????????? ??? «city cards» ?? «????????? ?????????? ??????»

67. ??????? ?? ?????????????? ? ?????? ?????????????? ??? ?? ???? ?????? ?????? ???
????????????????? ?? ?????? ??? «city card», ?????? ??? ? ?????????? ??? ?? ???? ?????? ???.

68. ? ?????????? ??? ??? ?????????? ?????????? ?????? ??? «city cards» ??????????
?? ????? 30? ??? 73? ??? ?????? ??? ??? ???.

69. ? ?????????? ??? ?????????????? ?????????? ??? ?????????? ??? ?? ???? ?????? ???
????????? ?????? ?? ?????? ?? ??? «city cards». ?? ?? ??????, ?? ?????????? ??? ??????????
?? ?????? ?? ?? ?????? ??? ?????????? ??? ?????????????????? ??? ?? ?????? ??????
????? ?????????? ??? ?????? ??? ?? ?????? ?????????? ??? ??????, ?????? ??? ?????? ?? ?? ???
????????? ??? ??????, ? ?????? ?????????? ??? ??? ?? ?????????? ??? ?????? ?????? ??? ?????? ???
????????? ?????????? ?????????? ?? ?? ?????????? ??? ?????????????? ??? ?? «city cards», ????
????????? ??? ?????? ??? ?????? ??? ??????, ??? ?????????? ??? ?????? ?????????? ??? ?????? ???
??? «?????????».

70. ??????? ?? ?? ?????? 30?, ?????????? 2, ??? ?????? ??? ?? ???, ??? ??????????????
?? ??????? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????????????? ?????????? ??? ?????? ???
?? ?????????????? ?????? ??? ?????????? ?????????? ??? ??????, ??? ?????????????? ???
?? ?????????????? ??? ?????????? ?????????? ??? ?????? ??? ?????????????? ??? ?????? ???
????????? ????. ??? ?????????? ??????, ??? ?????? ?????? ?????? ??? «city card», ??? ????
????????? ??? ?? ?????????? ?????????? ??? ?????? ??? ?????? ??? (39). ?????????? ??? ?? ???
????? ??? ?? ?????? ??? ?????????? ?????????? ??? ?????? ??? ?????????? ??? ?????? ???
????????? ??? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ???
?? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

71. ?? «city cards» ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????????? ???
?? ?????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????????? ??? ?????? ???
?????????. ?????????? ??? ? ?????? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ???
????? ??? ?? ?????????? ??? ?????????? ??? ??????, ?????????? ??? ?????? ??? ?????? ???
????? ?? ?????????? ?? ?????? ??? ??????. ?????, ?????????? ??? ?????? ??? ?????? ???
????????? ??? ?????????? ?????????? ?? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ???,
????????? ??? ?????????? ?????????? ?? ?? «????????? ??????» ??? ?????????? ???
????? 32 ??? ?????????? ?????????? ?????? ??? ?????? ??? ?????????? ??? ?????? ???
????????? ??? ??? ?????? ??? ?????? ??? ??????????.

72. ??? ?? ?????? ???, ? ?????? ?????????? ??? ?????????????? ??? ?????????? ???
????????? ??? ?? ?????????? ??? ?????? ??? 30?, ?????????? 2, ??? ?? ?????? 73?
??? ?????? ??? ?? ?. ? ?????? ?????? ?????? ??? «[?]???

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

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

????????? ??? ?????? ??????, ?????????? ?? ???». ? ?????? ?????? ??? ?????? ??? «[...] ?

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

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73. ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????????? ??? ?????? ?????????? ???

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?????? ? ?????????? ?????????????? ?? ?????? ??? ?????????????? ??? ???? ?????? ??? ??????????
(40). ??????, ??? ? ??? ? ??? ???? ?????????????? ??? ?????? ?????? ?????????? ?????????????? ???
????????? ??? ?????????? ??? ?????? ??? ?????? ?????????????? ??? ?????? ?????????? ?????????? ???
????????? ?? ??? . ?? ??? ???? ?????????????? ?? ?????? ??? ?????????? ??? ?????????? ?????????? ?
????????? ??????????, ???????? ?? ?? ?????? 30?, ?????????? 2, ??? ?????? ??? ??? ??? ?, ?
?? ??? ??? ?? ??? ??? «????????? ??????» ?????? ?? ?????????? ??? ??? ??? ?????? ???
??????.

74. ?? ?????????????? ?????????? ??? ??? ?????? ??? ???? ???? ???? ?????? ??? ?????????? ??? ???
???. ??????????, ??? ??????????, ??? ?????????? ??? ?????????? ??? ?????????? ?????????? (???????)
??? ?????? 306 ?. ??? ?????? ??? ??? ???) (41), ??? ???? ???? ?????? ??? ??????
????????? ?? ?????????? ?????? ??? ?????????? ?????????? (????? 308 ??? ?????? ???
??? ???).

75. ??????, ?????????????? ??? «city cards» ?? ??????? ?????????? ??????, ?
?????? ??? ??? ??? ?????? ?? ?????????? ??? ?? ?????? ?? ?????????? ??????, ??????? ??
?? ??? ?????? ?????? ?????????? ??? ?????? ?????? ?? ??? ?????? ?????? ??? ??? . ???????
????????? ?? ??? ?????? ?????????? ??? ?? ?? ?????????? . ?????? ?????? ??? ?????????? ???
????? ??? ?????????? ??? ?????? ?? «city cards» ?????? ?????????? ?????????? ??????. ?
????? ??? ?????????????? ??? ?????? ?????? ??? ?????? ??? ?????? 2016, ?????? ??????????????
??? ?????? ?????????? ??? «city cards», ?????????? ??? ?????? ??? ?????? ?????? ???
????????????? ??? ?????? ??? ?????? ?? ??? ?????? ?????? ??? ?????? ?? ?????????????? ??
????????? ??? ?????? ??? (42).

76. ??????, ? ??? ?????? ?????? ??? ?????? ??? ?????? ?????????? ?????????? –? ??? ?????? ??????
????? ??? ?? ?????????? ??? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
2016 (43) ??? ?????? ??? ?????? ??? ?????????? ?????????? ??? ?????? ??? ?????? ??? ??????????
??? ?????????? ??? ??? ?????? ??? «city card» ??? ??? ??? ?????????????? ??????
????? ? ?????? ??????????– ?? ?????? ?? ?????? ?? ?????? ??? ?????? ?????????? (44). ? ??????
?? ?????????? ??? «????? ??????»(45)? ?????? ?? ?????? ??? ?????????? , ??? ??????????
? ??????, ?????? ??? ?????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????????? ???
????????? ? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ???
????????? (46).

77. ?? ??????????, ? ?????????? ??? «city cards» ?? ??????? ?????????? ?????? ???
????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? «city card» ??? ?????? ???
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ??? ??? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

V. ??????

78. ??????????, ?????? ??? ?????????? ?? ?????????? ??? ?????????? ?????????? ??????
??? Högsta förvaltningsdomstolen (???????) ?????? ?? ???:
?? ?????? ??? ?????? ?? ?????????? ??? ?????? ??? ?? ?????? ??? ?????????? ?????????? ???
????????? ?? ?????????? ??? ?? ?????? ??? ?????? ?????????? ??? ?????? ? ?????????? ??? ???
????? ??? ?? ?????? ??? ?????? , ??? ?????? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? «?????»

?????? ?? ?????? 30? ??? ??????? 2006/112/?? ??? ???????????, ??? 28?? ??????????
2006, ??????? ?? ?? ????? ?????? ?????? ?????? ?????????????? ??????. ??? ?????? ?????? ???
???? ?????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ???
????????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???
????????? ???????. ??? ? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ???
??? ??? ?????? ? ?????? ?????? ?? ?????? ?????? ?? ?????? ?????? ?????? ??? ?????? ?????? ???
????? ?????????? ??? ?????? ??????, ?? ?????? ?????? ?????? «?????? ?????????? ??????»
????? ??? ?????? ??? ?????? ??????.

1 ?????? ??? ??????????: ? ??????.

2 ??? ?????????????? ??? ?????? ?????? ??? ?????? GE Aircraft Engine Services
(C?607/20, EU:C:2022:63) ??? 27?? ?????????? 2022.

3 ???. ?????? 2016/1065 ??? ??????????, ??? 27?? ?????? 2016, ??? ??? ??????????
?? ?????? 2006/112/?? ??? ?????? ??? ?????????? ??? ?????? (?? 2016, L 177, ?. 9)
(??? ????: ?????? ??? 2016).

4 ?????? ??? ??????????, ??? 28?? ??????? 2006, ??????? ?? ?? ?????? ?????? ??????
????????????? ??? (EE 2006, L 347, ?. 1).

5 ????. ?????????? ??? 1, 3 ??? 8 ??? ?????? ??? 2016.

6 ??? ?????? 77/388/???. ??? ??????????, ??? 17?? ????? 1977, ??? ?????????? ???
????????? ??? ?????? ?????, ??? ?????? ?? ??? ?????? ?????? ?????? ?????? – ???
????? ?????? ?????????? ????: ?????????? ?????? ??? (?? ????. ????. 09/001, ?. 49) (??? ????: ??? ??????).

7 ?? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? –? ?? ?????? ??????
????????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? – ??? ??
????? ?????? ?? ?????? ??? «city cards» ??? ?? ?????? ?????? ?????? ??? 1? ??????????
2019.

8 ?? ?????? 398, ?????????? 1, ??? ?????? ??? ?????? ??? ?????? ?? ????: «????????????? ???
????????????? ??? ?????? ?????? ?????? ?????? ???, ? ??? ?????? ?????? “????????? ???”».

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- 20 ??? ??????? ??????? ??? ??????? ?????? ?????? ??????? ??? ?????? ???????, ???. ?????? 45 ??? 53 ??? ??????? ???????.
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- 30 ?? ??? ? ??????? ??? ??? ??????? ?? ?????????? ?? ?????? ??? ?????? ?????????? ??????? ??? ?????? ??? ?????? ?????? ?????? «city cards» ??? ?????? ??? ?????????? ??? ?? ????. ?????? ???, «Working Paper No 987, Minutes», 2 ?????????? 2019, ?. 5.
- 31 ?????????? ??? 6 ??? ?????? ??? 2016.
- 32 ??? ?? ??????? ??? ?????????? ??? ?? ?????? ??? ?????? ??? ?????? ???, ??? ?? ?????? ??? ???????

????? ??? ???? ?????????????? ??????? ?? ??????? ?????????? ?????? ??? ??????? ??????? ??
???????????????, ???? ??? ?????????? ?????????? ?? ?????????? ??? ???????????. ?
????????????? ???? ?????????? ?? ?????????? ?????? 12 ??? ?????? ??? 2016, ? ????
????? ?? ????: «? ??????? ?????? ?? ?????????? ?????? ?????????? ??? ?????? ??? ?????? ??
????????? ?????????? ?????? ?? ?????????? ?????? ??? ?????? ?????????? ??? ?????? ??
????????? ??? ?????????? ?????? ?? ?????? ??? ?????????? ??? ?????????? ??? ?? ?????? ???
????????????? ??? ??? ??????».

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????????? ?????????? ??? ? ?????????? ?????? ?????????? ?????????? ?????????? ?????? ??
????????? ?????? ?????? (Amand, C., «EU Value Added Tax: The Directive on Vouchers in the
Light of the General Value Added Tax Rules», ?. 154, ???. ?????????? 9 ?????????? ??? Terra,
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World Journal of VAT/GST Law, 2017, ?. 30). ?? ?????? ?????????? ?????????? ?,
????????????? ?????? ?? ??? ?????? ??? ?????????? ??? ?????????? ??? 23?? ?????????? 2015, Air
France-KLM ??? Hop!Brit Air (C?250/14 ??? C?289/14, EU:C:2015:841), ??? ?? ?? ?????? ???
????????????? ?????? 5 ??? ?????? ??? 2016, ??? ?? ?????????? ??? ?????? ???????????.
??????, ?? ?????? ??? ??? ?????? ?????? ??? ?????? ??? ?????? ?????????? ?????????? ??????????.

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40 ?? ?????? ??? ?????? ?????????? ??? ?? ??? ?? ?????????????? ?????????? ??????????
?????? ?? ?????? ??????????, ?? ?? ?????????? ?? ?????? ?????????? ?????????? ?????? ??
?????? ?????????? ?????????? ?????? ??? (????? ??? ? ?????? ?????? ?????????? ?????????? ???
??? ??? ???). ? ?????? ??? ?????? ?? ?????????? ??? ??? ?? ?????????????? ???
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41 ??? ?? ???, ? ?????????? ??? ?????????? ?? ?????????? ?????????? ?????????? ????.
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13?? ?????????? 2005, ISt (C?200/04, EU:C:2005:608).

42 ???. ?????? 32 ??? ?????????? ?????????? ??? ?? ?????????????? ?????????? ??????????.

43 ??????, ???. ?????????? 16 ??? ?????? ??????.

44 ???. ??? ?????????? ??? ??? ?????? GE Aircraft Engine Services (C?607/20,
EU:C:2022:63) ??? 27?? ?????????? 2022, ?????? 53.

45 ???. ?????? 29 ??? 32 ??? ?????? ??????.

46 ?????????? 5 ??? ??????? ??? 2016.