

#	Issue	Description	Status Quo		
	TAX COMMITTEE				
	1. E-commerce legal amendments (Digitalization Package #2)	Facilitating customs procedures for online exports, stimulating postal and courier services	In process. Analysis performed by PwC - proposals submitted to Customs, Tax Office and MF, were presented to CONSECON. The most important aspects and achievements regarding the implementation of the Package 1 of legislative acts for the digitalization of the economy, regarding the promotion of digital notarial services for the business community, as well as the preparation of the e-commerce legislative package were reviewed. e-Commerce legislative package was reviewed and prepared for the Government approval. The list of curierat services were reflected in the Legal Initiative by Deputy Prime minister for Digitalization and submitted to Ministry of Finance. The Government amended at the end of December the existing line legislation: Law on internal trade no. 231/2010 Law on entrepreneurship and enterprises no. 845/1992 Law on electronic commerce no. 284/2004 The law regarding the regime of precious metals and precious stones no. 282/2004 Law on consumer protection no. 105/2003 The Contravention Code of the Republic of Moldova no. 218/2008 The law regarding the manufacture and circulation of ethyl alcohol and of alcoholic production no. 1100/2000 Vine and wine law no. 57/2006 Electronic Communications Law No. 241/2007 Law on limited liability companies no. 135/2007 Law on the protection of personal data no. 133/2011		



2.	Extending tax neutrality	The proposal is to extend tax neutrality principle from the perspective of income tax and VAT in relation to actions taken by the local companies in regard with Ukrainian refugee's support.	In process. Position Paper submitted to Prime-minister, Government, MoF&MoE.
3.	Tax shortcomings in the current context	The aim is to address the immediate issues faced by the EBA members under the current context, as well as the proposals submitted with a major impact on several industries	In process. The proposals discussed within Tax and Customs Committee were included in the Position paper that was addressed to the authorities (17.03). EBA presented the main concerns regarding the Tax policy as well as the important measures to be revised by the authorities in the Article in Logos Press (25.03) and debated within the meeting with the Minister of Finance (15.04), In the Article in Logos Press (02.12), in interview held on 06.10 in Agora studio.
4.	Tax policy 2023	Promoting measures to support business in post-pandemic conditions, priority proposals for tax policy 2023	In process. EBA proposals submitted to MF, discussed within the meeting with Minister of Finance (15.04) and with Fiscal Advisory Council (17.06), Partially accomplished. Among the priorities regarding tax policy 2023 identified by EBA were accepted the following: 1. maintaining the income tax rate for incomes above 1 million lei, 2. postponement of entrance into force of the transfer pricing mechanism, 3. postponement of entrance into force of the right of the State Fiscal Service to reclassify transactions, 4. deducting the expenses incurred and determined by the employer for any payments made for the benefit of the employee, in relation to which the salary taxes were calculated/withheld, without the requirement to demonstrate that they are ordinary and necessary 5. the increase of the lamp sum for tax purposes of a meal ticket per working day (from 55 to 70 lei)



5.	The increase of the deductible limit for transportation of the employees	Amendment of GD 693/2018 ref increase of deductible limit for transportation expenses and meal tickets. AGRICULTURE & ENVIRONMENT	Partially accomplished. EBA proposed the increase of the deductible limit of the expenses related to the transportation of the employees (from 35 lei/per employee to 100 lei/per employee). The limit for transportation expenses was increased from 35 lei per employee up to 65 lei. T COMMITTEE
6.		Development of storage systems related to returnable packaging in the context of the introduction of the REP principle. Deficiencies related to the draft order regarding the approval of the List of packaging for which the "deposit" system	Close to finalize. Order no. 08 of Environment Agency approved on 23rd of March related to list of packages approval for which the "storage" system will be applied. Discussions with GIZ on common activities. Request to replace with declared price deposit submitted to EA. The draft order debated at the 5th REP Working Group Meeting and within Agriculture and Environment Committee meeting. Discussions held with REP Meeting: Ministry of Finance; Minister of Environment; GIZ; Romanian REP Association on EPR.
7.	Extended Producer Responsibility (EPR)	Due to the EBA previous support (2021) implying development of Analytical Paper and necessary legal amendments (with GIZ and EU funds) - in 2022 EBA Moldova became a part of a working group created by the Ministry of Environment aimed at finalizing the necessary amendments related to EPR and proper wastes management system.	 In process: EBA participated at 5 working group meetings of the Ministry of Environment EBA participated in 4 technical meetings with Minister of Environment, Minister of Finance, Romanian EPR Organization (FEPRA) EBA identified EPR as one of the key policy priorities of EBA included also in the Tax Policy as one of the key priorities EBA included EPR as one of the priorities within the Prime Minister Economic Council Gr2 EBA contracted GIZ funds and necessary consultancy to develop relevant legal and normative amendments and the draft of the GD on EPR as well as Informative Note which were submitted to the Minister of Environment.



			 EBA informed the DG Environment about the issue and the issue was approached in the meetings with EU Commissioner for Environment, Mr. Virginijus Sinkevičius. EBA succeeded to advocate the issue within Environment and Budget, Economy and Finance parliamentary commissions. A common DP (EBA, APIA, AIR, FIA, AmCham) submitted to Presidency, Parliament, Prime-minister, parliamentary commissions and relevant Embassies (USA, Germany, Ukraine, Romania). The Ministry of Environment initiated the public consultations on amendment of GD no. 561/2020 for the approval of the Regulation on packaging and packaging waste and the drafting of the Government Decision to amend Law no. 209/2016 on waste. On December 1st EBA members met with the newly appointed Minister of Environment, Mrs. Rodica Iordanca Iordanov and Mrs. Ina Coşeru, Deputy Chair of the Parliamentary Commission on Environment and Regional Development and concluding that existing Law 1540 to be replaced by a new one in 2023 and the environment tax to be paid in 2023 by amending the GD no. 561/2020 after the entry into force of the new law. The List of waste products will be extended under the new law.
8.	GD 938 Regulation regarding	Amendment of Regulation on the mode of	Close to finalize.
	the mode of crossing state border of goods subject to ANSA control	state border crossing of goods subject to control by ANSA	 Regulatory Analysis Impact of the draft GD was performed. The draft was adopted conditionally so as to include observations, comments related to ANSA controls, and statistical data to provide transparency to the carried controls. The draft of GD was positively approved by the Ministry of Economy and Ministry of Agriculture and Food Industry. Following all the feedback from all the stakeholders - new draft was defined and presented by ANSA. A DP submitted by EBA at the end of September. The submitted draft proposals were discussed on the Prime Minister Economic Council (CONSECON) platform with Minister of Agriculture and Director General of ANSA, the meeting was chaired by the EBA as Chair of Trade Facilitation Committee within CONSECON.



9.	Illegal logging, pallet and unfair competition	Processes of interaction of natural / legal persons to ensure them with the necessary resources from the national forest fund, in compliance with norms meant to protect natural resources (GD no. 740/2003, GD no.	The amendments were processed by the members of the Prime Minister Economic Council, to be discussed at the State Secretaries Meeting and to be submitted to the Government for approval. In process Position Paper submitted to Ministry of Environment and Moldsilva. Meeting with Moldsilva concluded the need to amending the national legal framework regarding the use of pallets and phytosanitary requirements in import and export of goods.
		27/2004), the harvesting of wood being subject to authorization in order to avoid the uncontrolled use of limited and hard-to-renew resources	Moldsilva committed to initiate the amendment of national legal framework regarding the use of raw material for compliant of pallets production.
		HUMAN RESOURCES CON	I 1MITTEE
10	Support measures for employers and employees in the context of Covid 19 MMPS	To present the current legal framework related to labor relations in the context of the Covid-19 pandemic	Accomplished. EBA Moldova's objections regarding the Compensation Mechanisms for employees and employers in the context of the pandemic situation submitted to MMPS. EBA Members participated in the development of compensation schemes related to energy bills.
11	Deficiencies faced by the business community in this sector	 Definitive removal from the employer's shoulders of military records of employees. Approval by the Government of the Regulation attesting the employees / Elimination of the reference to a standard Regulation drafted by the Government. Due to the reference to such a non-existent Regulation, professional misconduct has in fact become null and void as a reason for dismissal. The need to reform social security contributions for freelancers / freelancers. The need to regulate work through 	In process EBA proposals addressed within the Committee. Position Paper developed and submitted to MMPS and debated within Parliamentary Commission for Labor and Social Protection Issue #2 Accomplished



12	Legal amendments to the Labor Code:	Romania by the Labor Code chapter VII). The existence of companies whose object of activity is the "lending" of staff to any company becomes essential in an economy where human resources (either skilled or unskilled) have become insufficient at the national level. 5. Review of the mechanism for establishing "force majeure". We mention that the Chamber of Industry and Commerce has not issued and does not issue such certificates for labor relations. EBA issued 3 position papers in which the amendments to the Labor Code were listed and arguments presented/explained related to: Art. 33, Art. 421, Art. 51, to complete the LC with a new article, Article 531. Noncompete clause, Art. 55, Art. 58, Art 591, Art. 62, Art. 85, Art. 86, Art. 97, Art. 101, Art. 104, Art. 141, Art. 143, Art. 183, Art. 186, Art. 209	Partially Accomplished The legal amendments proposed by the EBA have passed the first Parliament reading. PP amendments to the Labor Code addressed to CPS (23.05) (EMPLOYERS/ Public Hearing) Amendments to the Labor Code (SYNDICATES/ Public Hearing). Final Public Hearing as of 25.05 draft Law no.146 regarding amendment of Labour Code, which were approved in October by Law no 283/2022 included: Non-compete clause
		Art. 141, Art. 143, Art. 183, Art. 186, Art. 209	 Non-compete clause Probation period Information regarding the conditions of activity Employee performance evaluation
			Payment form
		BANKING COMMITT	<u>ee</u>
13	Communication digitization of business with bailiffs	Representatives of the banking sector, who have been facing significant difficulties for a long time in communication with bailiffs	In process. Draft Position paper developed and addressed to the Ministry of Justice to ensure digitization of the communication process related



14.	Liberalization of the payment field / ABM Experts Commission	Modification of some normative acts regarding the credit transfer Liberalization of the payment field	Electronic Registry in the process of exchanging information with the banking community. Updated Draft Position Paper banking sector in relation to bailiffs EBA ABM addressed to the Ministry of Justice and request of EBA working group is set up to address the issue. The issue was debated within the meeting with Mr. Litvinenco, Minister of Justice. The Ministry of Justice committed to progress on the bailiff's issue. Position Paper EBA ABM AmCham addressed to SPCSB (15.03)
15.	Payments threshold from the merchants Payment services (PSD 2) - Directive (EU) 2015/2366	PSD 2: Draft Law amending some normative acts (Law no. 548/1995 on the National Bank of Moldova - art. 5, 10, 491; Fiscal Code no. 1163/1997 - art. 5, 254 transposing Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market. The context of the legislative initiative which involves the establishment of a maximum threshold for payments received from the merchant.	In process. The technical meeting of the NBM team and of the banking sector, about 40 participants from the EBA member companies, held on May 16, on the subject of the PSD2 Directive in the Republic of Moldova. The draft law to be presented by the Parliament and the legal proposals by members to be collected. NBM created two working groups: on drafting the secondary relevant legal framework to implement PSD 2 on the SEPA requirements. EBA DP and proposals submitted.4 technical meetings took place with NBM. The draft legal package is in the NBM waiting to be submitted to the parliament.
		AUTOMOTIVE COMMI	
16.	Certification issues related to cars import	Risk of stopping the import of new cars and vehicles into the Republic of Moldova was ruled out, by amending the provisions prohibiting the import and supply of radio equipment, including those incorporated in cars, which simultaneously passed certification in the EU and Moldova.	Accomplished . GD No. 208 of 30-03-2022 approved the modification of point 3 sub-item 3) of the Government Decision no. 34/2019 on the approval of the Technical Regulation "Making radio equipment available on the market".



	REGULATORY FRAMEWORK COMMITTEE			
17	GDPR related laws improvement	The objective is to present additional comments and proposals to the respective laws before its approval in the second reading of the Parliament, thus avoiding any risks and financial burdens for business environment by approving the draft laws in current version. Regulation (EU) 2016/679 as of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of personal data.	In process. EBA Position paper submitted to NCDP. An Agreement to include EBA representative in the WG regarding GDPR and Digitalization, obtained within the meeting with Sergiu Litvinenco – Minister of Justice, in the context of Government measures and actions taken in the field of justice and the rule of law. EBA delegated a representative in the GDPR WG responsible for approximation of national legal framework to Regulation (EU) 2016/679. 3 meetings took place on the Ministry of Justice platform as lead institution. A part of EBA proposal were included. The laws revision is ongoing.	
18.	Digitalization	Electronic identification and reliable services. Approved GD no. 203 for the approval of the draft law on electronic identification and trust services, promoted by SIS, submitted to Parliament.	In process. Debated within Regulatory committee meeting on 13.04. EBA requested meeting with SIS refused. The parliament approved the draft law on electronic identification and trust services.	
19	Unfair business practices under the draft Law 231 on Internal Trade	Alarming provisions, which are not reflected in Directive 2019/633, and which contravene the national normative framework, as well as the unanimously recognized principles and norms of international law. The proposed main limitations infringe principal of freedom of trade, Moldovan commitments under AA/DCFTA and establish unfair business practices.	In process. Presentation of proposals for draft amendments discussed with State Secretary - Vadim Gumene. Position Paper submitted to Competition Council; the main EBA concerns have been confirmed by the opinion issued by the authority. The updated draft submitted to stakeholders on 12 of April. Awareness discussed with Ministry of Economy on 19 of April. The limitation related to obligation to offer at least 50% of market shelf for local products was excluded. In the context of the repeated approval of the final draft of the Government decision on the approval of the draft law on unfair commercial practices EBA reiterated its position (24.04). Competition issues related in regard to unfair competition on the market and amendments to existent Competition Law discussed with the President of the Romanian Competition Council, Mr.	



			Bogdan Chiriţoiu and the President of the Moldovan Competition Council Mr. Alexei Ghertescu. Additional EBA paper position submitted to the Parliament due to non-consideration of arguments (30.06). After approval in the first reading by the Parliament, EBA Position Paper submitted (05.07) to Parliamentary Commission CEB and Ministry of Economy on the "listing" issues. The draft law was approved in first reading. The "listing" issues were debated on the CEB parliamentary platform with MoE, MoAFI on 25.07.
20	Nomenclature of Goods	Updating the Combined Nomenclature of Goods according to Law 172/2014	In process. EBA proposals submitted to MoE on updating the Combined Nomenclature of Goods
	Phytosanitary requirements for wooden packaging	Compliance with the commitments of the Moldova-EU / DCFTA Association Agreement regarding the gap in the regulation of phytosanitary requirements for wooden packaging	In process. EBA position paper submitted to Parliamentary commission on agriculture and food industry, Ministry of Agriculture regarding the compliance with the commitments of the Moldova-EU / DCFTA Association Agreement regarding the gap in the regulation of phytosanitary requirements for wooden packaging. MoE confirms the need to transpose the EU standards to national legal framework which is out of the date. ANSA together with MAFI have to initiate the amending legislative process. Ministry of Agriculture and Food Industry confirmed the need and readiness to amend the legal framework. The following legal acts to be emended: Law no. 228 as of September 23, 2010 "On plant protection and phytosanitary quarantine", partially transposes a series of EU legal acts, which are currently repealed or essentially modified. Government Decision no. 594/2011 and Government Decision no. 558/2011 which ensures the implementation of the provisions of the mentioned Law, with EU legislation on the phytosanitary sector (Section 6 of Annex XXIV-B to the Association Agreement).
22.	List of socially important products as well as the method of calculating the commercial threshold with	Revision of social important products list and update the mechanism on commercial threshold by including costs related to energy and supply crises	 In process. Amendments related to the list of socially important products as well as the method of calculating the commercial threshold presented in several meetings with Minister of Economy. Position



	Ministry of Economy (7 meetings)		papers on the Draft amendment of the Government decision for the amendment of the Annex to the Government Decision no. 774/2016 on the marketing prices of socially important products and CSE Disposition no.02/2022 submitted. • Few of proposals were taken into consideration (frozen premium class fish,). • In debate is adjustment of commercial fee from 20% to 30%, taken into account constant increase of fuels and energy resources prices. • New amendments are in discussions with a partial progress on the EBA proposals with Ministry of Economy on bilateral level.
23	Modification of the Execution Code.	Developing a Joint Position Paper on Amending the Enforcement Code (Banking)	In process. Position paper finalized and submitted to the Ministry of Justice. Working meeting with Ministry of Justice to be scheduled.
	code.	by EBA and ABM (Moldovan Banks Association)	Justice. Working meeting with Ministry of Justice to be scheduled.
24	SIA CCDE implementation.	The Tax Service Instruction on how to send and receive electronic documents through the automated information system for the creation and circulation of electronic documents (SIA CCDE). The draft establishes the circulation of electronic documents between the State Tax Service, the National Bank of Moldova, commercial banks, payment service providers, bailiffs and public authorities issuing enforcement orders, as well as the rules for using the CCDE SIA.	In process. EBA proposals submitted to Moldova Bank Association (ABM). ABM has to submit to STS. There are discrepancies on strategical approach between Tax Service and National Bank.
25	Reference pricing (tobacco)	Introduction of the requirement to prepare transfer pricing documentation for related party transactions. The proposed legislative changes have a very general character, not being regulated concrete criteria and a clear methodology on how to be applied within the tax inspections.	In process. EBA DP was submitted to Ministry of Finance in the context of tax policy 2023 and to Parliamentary Commission on Economy, Budget and Finance. Technical meetings took place with key stakeholders. The Government approved in the final stage the EBA proposals. 3 joint meetings took place (Economy and Budget and Social Protection) on the parliamentary platform.



26	Track and Trace system	A new draft law presented by the Parliament	In process.
	(tobacco)	to implement the track and trace system on	EBA DP submitted to the line parliamentary commissions. Following
		the tobacco products.	4 technical meetings, the author decided to postpone the entry in
			force of the new law by offering a longer transition period according
			to EU practices and ensure a full compliance with EU Directive in this
			regard.
			The parliamentary commission decided to extend the transition
			period to 36 months and several amendments to be included.
27	Fuel compliance control	The Government initiated the amendment of	Close to finalize.
	(certification for oil and fuel	bylaws acts related to fuel compliance	The EBA DP submitted to Ministry of Economy and twice debated
	products)	control.	within the Working Group responsible for the Regulatory Impact
			Analysis (AIR) being returned to the author for review in order not to
			impose a decrease in the degree of market surveillance, which will
			not ensure that the products comply with the requirements set out
			in Community legislation or may endanger health, safety or other
			aspects related to the protection of public interests.
			On the import of the main petroleum products originating in
			member countries of the European Union (EU) no sampling is
			required. The GD approved as of 14.12.22.
28.	AML Law 308	The National Security Parliamentary	In process.
		Commission initiated the amending of Law on	Technical discussions took place within the EBA Regulatory
		Anti Money Laundering.	Committee. EBA DP submitted to the Office for Prevention and Fight
			Against Money Laundering (OPFAML) and debated in several
			meetings with OPFAML and Parliamentary responsible Commission.
			EBA proposals submitted to SPCSB (FIU Moldova). Partially taken
			into consideration. An additional round of discussions to take place
		T. N 16 17	between first and second reading.
29.	The set of Intelligence and	The National Security Parliamentary	In process.
	Security Service (SIS) draft	Commission initiated the consultations of:	The draft laws were proposed in the context of evolution of military
	laws	The draft law on the Intelligence and	conflict from Ukraine and in the context of online activity. The
		Security Service of the Republic of	intelligence Service is to be empowered with the "regulation"
		Moldova, no.420 as of 17.11.2022	mechanism for electronic signatures. The draft laws debated within
		The draft law for the amendment of	the EBA Regulatory Committee.
		Law no. 170/2007 on the status of	



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		 the information and security officer, no. 421 of 17.11.2022 The draft law on counter-informative activity and external informative activity, no. 422 of 17.11.2022. 	EBA DP to be submitted for next round of consultations between first and second reading. The SIS is looking for Venice Commission opinion on the draft laws. Tentatively to be presented in the mid of January 2023
		INFRASTRUCTURE AND ENERGY	Y COMMITTEE
30	Amendment to Contravention Code	Modification of the provision of art. 163 of the Code of Contravention (Premier Energy) in relation to non-compliance with the requirements for the protection of electricity networks	Close to finalize. EBA position paper on amendments proposals submitted and debated with line parliamentary commissions. Modification proposals submitted and debated with line parliamentary commissions. The EBA proposal on amendments to the provision of art. 163 of the Contravention Code were accepted, which is intended to cover the values protected by the Regulation on the protection of electricity networks and to prevent further violations. As a result, non-compliance with the requirements for the protection of electricity networks will be sanctioned, which can result in serious consequences for the life/ health of the population, but also for the affected goods.
31	Renewables energy production	Since 2018 the launch of tenders for renewable energy production capacities is blocked / postponed. Urgent actions to be undertaken: • Publishing the capacity limits and quota for the period 2021 – 2025; • Ensuring the bankability of the "fixed price" support scheme by modifying the primary normative framework (Law 10/2016 and Law 107/2016); • Launching and organizing tenders for renewable energy production capacities; 2	Close to finalize EBA position was discussed at the Energy Committee, Dirk Bushcle – representative energy Community (Vienna). EBA action plan in renewable sector Intentions for cooperation with MIDR on renewable was submitted. Initiation of WG meetings requested. Renewables, Resilience and Flexibility Options in the Republic of Moldova were debated within UNECE Renewable Energy Hard Talk event. EBA reiterated the urgent update of the legal framework on renewables and to deblock the bids. Two EBA Position Papers submitted to MIDR on the draft of the Government's decision for the amendment of the annex to the Government's decision no. 401/2021 regarding the approval of capacity limits, maximum quotas and categories of capacity in the



socially important products with Ministry of Economy and business

representatives.

		"Impact of a gas price shock on companies in Moldova" GET, October 2021 Page 12 of 12 • Regulation of the electricity producer by eliminating the capacity limit established in Law 107/2016, the possibility of signing long-term electricity acquisition contracts, as well as other changes that are required with the liberalization of the market;	field of electricity from renewable sources valid until the 31 st December 2025. Re-distribution of quotas for electricity from renewable sources debated with Minister Spinu, ANRE, EBRD, small and large producers. The Government decision approved without taking into account the EBA proposals. The annex of GD 401/2022 was amended and approved regarding the capacity limits, maximum rates and capacity categories in the		
		 Improving the "net metering" mechanism and promoting production for own consumption (eg non-reimbursable funds, interest-free loans, etc.); Elaboration of policies and assumption of targets for the periods 2030 and 2050 including intermediate targets (National Energy and Climate Plan, Energy Strategy of the Republic of Moldova, etc.); Adoption of mechanisms to promote / facilitate the production and trading of electricity from renewable sources on the open market, 	field of electricity from renewable sources • Early in November, EBA organized in partnership with Premier Energy, Sedera and Lafarge the Energy Transition Agenda 2022 international event, debating the priorities and challenges with all stakeholders (line public authorities, market participants, regional players and development partners). • The Energy Strategy Moldova 2050 publicly presented and discussed at the end of December. • Law 10 and 107 to be amended. Energy Community feedback received.		
EMERGENCY BUSINESS AID					
32.	A new tool to support businesses on a regular basis through policy initiatives aimed at ensuring sustainable business operation in the context of war in Ukraine.	Public Procurements/extended social products list	In process. Position paper submitted to relevant Parliamentary Committees and Government for approval/changing Decisions of Exceptional Situations Commission: CSE disposition no.11 as of 17.03 to be modified related to Public Procurements/extended social products list Submitted and debated EBA opinion on the Draft amendment of the Government decision for the amendment of the Annex to the Government Decision no. 774/2016 on the marketing prices of		



		Annual duty-free 0203 tariff rate quotas for	In process. Position paper submitted to relevant Parliamentary			
		the import of pork and poultry from EU	Committees and Government to increase the volume of the annual duty-free 0203 tariff rate quotas for the import of pork and poultry from EU			
		Tobacco/law 258 production transfer	Accomplished. Position paper submitted to relevant Parliamentary Committees and Government. Tobacco/law 258 production transfer approved by Decision CSE no.13 as of n 31.03			
		AML and imposed sanctions on RF	Accomplished. Delivered Webinar on imposed sanctions on RF with impact on Moldovan financial sector on 29.03, with international expertise.			
		Concerns of EBA members on import/export issues	Accomplished. The list of concerns of EBA members and proposed solutions were submitted to ME and MIDR (5 meetings). Simplified custom procedures on import included in CSE Decision no.12 as of 25.03			
		VAT deduction on procurements for	Accomplished. Position paper submitted to relevant Parliamentary			
		donations in the refugee's context	Committees and Government. Exception to VAT deduction on procurements for donations in the refugee's context included in the CSE decision no.4 as of 01.04			
	DELIVERABLES STATISTICS					
33	EBA Comm	ittees/Technical meetings	72			
34	Economic Counci	I to the Prime Minister meetings	17			
35	Mee	etings with Officials	56			
36	Working Group on Reg	gulatory Impact Assessment meetings	48			
37	Individual n	neetings with EBA Partners	169			
38	Companies that be	enefitted from Individual Support	70			
39	EBA International Conferences		4			
40	EBA Webinars/ Workshops		23			
41		Position Papers	33			