

Tax news of July



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Amendments in brief:

2025 Tax Reform. Major changes effective from August 1, 2025, and January 1, 2026 – Law no. 141/2025 on certain fiscal-budgetary measures was published in the Official Gazette no. 699 of July 25, 2025. This law introduces the most extensive changes in recent years concerning income taxation, VAT, health insurance contributions (Romanian “CASS”), and excise duties. The changes impact companies, financial institutions, and individuals, with applicability starting August 1, 2025, or January 1, 2026.

Transposition into national law of European rules on statutory audit – Law no. 137/2025 approving Government Emergency Ordinance no. 137/2024 amending and supplementing Law no. 162/2017 on the statutory audit of annual financial statements and consolidated financial statements, as well as amending certain normative acts, and Government Emergency Ordinance no. 75/1999 on financial audit activity, along with other amendments, was published in the Official Gazette no. 682 of July 22, 2025.

Amendments to certain provisions of the Fiscal Procedure Code – Ordinance no. 11/2025 amending and supplementing Law no. 207/2015 on the Fiscal Procedure Code was published in the Official Gazette no. 695 of July 24, 2025.

Updated fiscal risk criteria for registered consignees – Order no. 1826/2.372/2025 of the President of the National Agency for Fiscal Administration and the President of the Romanian Customs Authority amending and supplementing the annex to Order no. 417/1.204/2025 regarding the approval of the criteria for assessing fiscal risk for determining high-risk economic operators, as provided under Art. 375(11) and Art. 435(31) of Law no. 227/2015 on the Fiscal Code, was published in the Official Gazette no. 704 of July 29, 2025.

Other news of interest:

Fiscal measures concerning economic operators and amendments to the Fiscal Procedure Code – Law no. 119/2025 approving Government Emergency Ordinance no. 125/2024 for the completion of Article 2 and the suspension of certain provisions of Government Emergency Ordinance no. 28/1999 on the obligation of economic operators to use electronic cash registers, as well as for the completion of Law no. 207/2015 on the Fiscal Procedure Code, was published in the Official Gazette no. 619 of July 1, 2025.

Procedure for accessing the centralized electronic registry of sanctions applied under RO e-Transport – Order no. 1659/1622/101/2025 issued by the President of the National Agency for Fiscal Administration, the President of the Romanian Customs Authority, and the Deputy Prime Minister and Minister of Internal Affairs, approving the Procedure for accessing the electronic register of centralized records of applied sanctions, as provided under Article 14(3) of Government Emergency Ordinance no. 41/2022 establishing the National System for Monitoring the Road Transport of Goods (RO e-Transport) and repealing Article XXVIII of Government Emergency Ordinance no. 130/2021 on certain fiscal-

budgetary measures, deadline extensions, and amendments to certain normative acts, was published in the Official Gazette no. 634 of July 7, 2025.

Repeal of the technical rules regarding the authorization of the use of special seals within the Union/Common transit regime – Order no. 1728/2025 of the President of the National Agency for Fiscal Administration repealing Order no. 81/2017 of the President of the National Agency for Fiscal Administration on the approval of the Technical Rules regarding the authorization of the use of special seals in the Union/Common transit regime, was published in the Official Gazette no. 646 of July 9, 2025

Amendments in details:

Key words

- Tax reform
- 2025/2026
- Supplementary turnover tax for credit institutions
- VAT
- Excise duties and special taxes
- Health fund contribution
- August 1, 2025

2025 Tax Reform Major changes effective from August 1, 2025, and January 1, 2026 (Law no. 141/2025)

❖ Key tax changes for 2025 2026

- ✓ Dividend tax **increased from 10% to 16%**
- ✓ Supplementary turnover tax rate for credit institutions – 4% as of 1 July 2025
- ✓ Income tax and health fund contribution – cancelling certain exemptions and new obligation for individuals who obtain pension income.
- ✓ VAT – standard rate of 21% and reduced rate of 11%
- ✓ Excise duties – increased excise duties on fuel, tobacco, alcohol, non-alcoholic sugared beverages

❖ More details can be found in the document available at the following link:

[Tax Reform 2025-Major changes applicable as of 1st August 2025](#)

Key words

- Statutory audit
- The CSRD Directive
- ASPAAS

Transposition into national legislation of European norms on statutory audit (Law no. 137/2025)

- ❖ **The legislative act transposes European norms in the field of statutory audit into national legislation.**
- ❖ The CSRD Directive introduced the obligation for companies' sustainability reporting (covering environmental, social, and governance information) to be audited by the statutory auditor or audit firm.
- ❖ The statutory auditor provides an opinion based on a limited assurance engagement regarding the compliance of the reporting with the Directive's requirements.
- ❖ According to European requirements, statutory auditors are supervised by the national public oversight body, **The Authority for the Public Oversight of Statutory Audit Activity** (Romanian "ASPAAS").

Key words

- Tax procedure code
- OECD
- Advance pricing agreement (APA in short)

Amendments to certain provisions of the Tax Procedure Code (Ordinance no. 11/2025)

- ❖ **The ordinance amends certain provisions of the Tax Procedure Code related to advance pricing agreements (APAs)**, as well as the mutual agreement procedure for resolving international tax disputes.
- ❖ These changes aim to contribute to the resolution of international tax disputes, protect taxpayers' rights, and facilitates Romania's accession to the OECD.
- ❖ A new possibility is introduced allowing the advance pricing agreement (APA), which Romanian companies engaged in international transactions with affiliated parties must conclude, to be applied retroactively for previous tax periods—up to 5 fiscal years before the application—through the "roll-back APA" mechanism.

- Article 282 of the Tax Procedure Code

- ❖ The legislative amendment will enable companies requesting an APA to apply it not only for future years but also retroactively for up to 5 past years if the transactions are similar. Currently, Romanian legislation limits APA application to future transactions only, which can lead to tax disputes and double taxation.
- ❖ The APA is issued by the tax authority to establish transfer prices in advance for future transactions between affiliated persons, for a fixed period.
- ❖ **By amending Article 282 regarding the mutual agreement procedure,** a better application of international conventions and treaties for avoiding double taxation is ensured, reducing the risk of tax disputes and double taxation for Romanian taxpayers engaged in international economic activities.

Key words

- Fiscal risk criteria
- Article 375
- ANAF
- Tax history
- 5 years
- Tax Procedure Code

Updated fiscal risk criteria for registered consignees (Order no. 1826/2.372/2025)

- ❖ **The criteria for assessing fiscal risk have been amended as follows:**
 - ✓ Economic operators who have obtained authorizations and/or have been registered in the field of trading excise goods in the past 12 months are classified as high fiscal risk;
 - ✓ Companies that have declared their fiscal address at the headquarters of a law firm;
 - ✓ Companies with an inadequate tax history that fall under the following situations:
 - have recorded outstanding tax liabilities to the general consolidated budget in the last 5 years;
 - have submitted tax returns with a delay exceeding more than 5 days after the legal deadline in the past 12 months;
 - have benefited from installment payment agreements and/or restructuring in the past 5 years.
 - ✓ Companies whose majority shareholders/directors have, in the past 10 years, been shareholders/directors in companies authorized and/or registered in the field of excise goods trading, whose authorizations or certificates were revoked and which fall under one of the following situations:
 - At the date of deregistration or transfer of shares/stock, those companies had outstanding tax liabilities to the state budget;
 - Insolvency proceedings were initiated against them.
 - ✓ Companies that requested a reimbursement or compensation of amounts from the general consolidated budget, and for at least 25% of the requested amount the reimbursement right was denied following a control
 - ✓ Companies that do not have sufficient financial resources to support their monthly acquisitions of excise goods

Others news of interest:

<p>Key words</p> <ul style="list-style-type: none"> • EV charging stations • Fiscal cash registers • Semestrial report on life insurance • ASF • Sanctions 	<p>Fiscal measures concerning economic operators and amendments to the Fiscal Procedure Code (Law no. 119/2025)</p> <ul style="list-style-type: none"> ❖ <u>Operators providing electric vehicle charging services via vending machines</u>, where payment is made exclusively through bank cards or electronic wallets are exempt from the obligation to use fiscal cash registers. ❖ Until September 1, 2025, sanctions are suspended for fiscal receipt that do not include the beneficiary's identification code, the receipt identification number or the QR code details as provided in Article 4 paragraph 2¹ of Government Emergency Ordinance no. 28/1999. ❖ Starting January 1, 2025, entities regulated by the Financial Supervisory Authority (Romanian "ASF") are required to report biannually to the National Agency for Fiscal Administration ANAF, information regarding life insurance policies and other financial products (including the lists of resident individuals, type of product and other relevant details). ❖ Failure to comply with this obligation will be subject to fines ranging from LEI 20.000 to LEI 100.000.
<p>Key words</p> <ul style="list-style-type: none"> • Electronic centralized register • RO e-Transport 	<p>Procedure for accessing the centralized electronic registry of sanctions applied under RO e-Transport (Order no. 1659/1622/101/2025)</p> <ul style="list-style-type: none"> ❖ <u>The procedure for accessing the centralized electronic register of sanctions is approved. This supports the enforcement of the measure concerning the confiscation of the value of undeclared goods in the RO e-Transport system.</u> ❖ An electronic registry is created, which can be consulted by the authorities responsible for identifying violations under the RO e-Transport legislation. This allows them to verify the contravention history of an entity and apply appropriate sanctions accordingly. ❖ According to the procedure, enforcement agents are required to register the details of the sanctions applied after identifying and confirming the contraventions.
<p>Key words</p> <ul style="list-style-type: none"> • Union common transit procedure • RO e-Transport procedures 	<p>Repeal of the technical rules regarding the authorization of the use of special seals within the Union/Common transit regime (Order no. 1728/2025)</p> <ul style="list-style-type: none"> ❖ <u>The order expressly repels in full Order no 81/2017 officially ending the application of the technical rules that regulated the authorization of the use of special seals within the Union/Common transit procedure.</u> ❖ This repeal abolishes the regulatory framework that allowed the use of special seals in customs transit. Companies and customs authorities must comply with new regulations that replace the old rules. ❖ Economic operators and customs authorities are required to quickly adapt to alternative regulations governing Union/Common transit whether through new legislative provisions or technical regimes introduced by other

orders or decisions (e.g. **RO e-Transport procedures, e-Seal system and others**).



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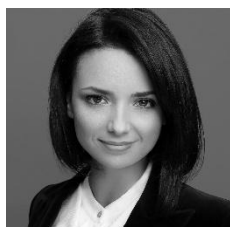
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