THE REVIEW OF REGULATORY DOCEMENTS ON TAXATION ISSUES IN JUNE–JULY 2015

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In the period under review, the situation in Russia remained relatively stable. Ministries and agencies worked on technical up-dating of the existing schemes and mechanisms of organization of economic relations and issued explanatory documents; higher judicial authorities analyzed problems which market entities encountered with in their activities and took decisions aimed at filling of the gaps in the legislation and had explanations as regards law enforcement practice published. The rules and principles of organization of interaction between the authorities, business and other taxpayers were tightened: companies registered in off-shores were barred from participating in state procurement[1], responsibility of managers of state-run corporations and entities with state participation for state property management[2] were strengthened; efforts to carry out market commercialization of large state projects were observed, time-limits were reduced and rules of recognition of property as vacant were set for immediate integration of that property in the economic turnover and responsibility of owners for timely disclosure and registration of their titles to real property in the Russian Federation was increased – all the above measures generally contributed to formation of a stable base of the budget system of all the levels.

The general situation in the economy is still a complicated one and the pursued policy is not consistent enough. Fearing deterioration of the social and economic situation in the country in case of reforms, the higher echelons of power keep looking for ways of exit from the crisis situation without carrying out structural reforms, modifying the existing scheme of distribution of resources in the country and tightening of budget expenditures though the country's leadership is well aware of the fact that preservation of the existing situation is quite a dangerous thing because the foundation of technological and investment stagnation and outflow of personnel with market competence is being laid; it is to be noted that technical and technological lag may get worse at a higher rate.

Retargeting to the East has failed so far and is unlikely to provide in the near future stimuli for development of production forces in Russia[3]. Russian producers of goods are not prepared, nor can assume infrastructure, R&D and other costs which ensure a technological breakthrough to a new level, the more so, there is nearby a territory with more favorable business conditions (for example, Kazakhstan) and the access to those conditions can be ensured only by a change in the place of location of the business; it is to be noted that the sales market – the territory of the Russian Federation – remains unchanged.

1 See Federal Law No.227-FZ of 13 July 2015.

2 By Federal Law No.265-FZ of 13 July 2015, Article 285 of the Criminal Code of the Russian Federation is now applied to officials of state-run companies, state and municipal unitary enterprises and joint-stock companies whose controlling interest is owned by the Russian Federation, constituent entities of the Russian Federation or municipal entities for causing damage of over Rb 7.5m ("Abuse of Office").

3 It is worth paying attention to the fact that Eastern corporate partners are overloaded with debts – according to experts estimates the debts of Chinese corporations amount to about $16.1 trillion which is equal to 160% of China's GDP (see, for example, the site: newsru.com/finance/19jul2015/china_corporate.html; site ng.ru/economics/2015-07-20/1_china.html: A. Bashkatova "China is Planting a Bomb under the World Economy, Russia is Advised to Look for Other Strategic Partners Besides China" and other). It means that the funds and resources used happened to be "tied-up", that is, the manufactured goods failed to be sold and paid for. Perhaps, the above is evidence of surplus production and the fact that the limits of export of the produced goods (jobs and services) have been achieved. Probably, in China they have the same situation as in the Russian economy (but the extent is greater) where borrowers and creditors are actually the same persons, that is, loans are provided out of the profit taken "to the West". In any case, non-repayment of the invested funds may trigger off a crisis and bankruptcies. In case of a large-scale promotion of commercial relations between Russian and Chinese parties, a situation may arise where an advanced payment received from Russian partners is used by the Chinese side on repayment of their debts to third persons. Eventually, advance payments transferred by Russian customers will be recovered through receivership procedures.
It is to be pointed out that a large commercial debt of Chinese partners complicates settlements in national currencies as payment for hydrocarbons and other Russian primary products in yuan actually means lending to the Chinese economy without a collateral (it is unlikely that the government will spend its hard currency reserves if there is an opportunity for businessmen to make settlements with their counterparties in national currencies). For the economy overloaded with debts the opportunity to make settlements in a national currency is actually a way out as it permits to smooth considerably and exclude in principle the threat of large-scale bankruptcies of local businessmen even in a situation of big debts. However, it is to be borne in mind that the risks of sudden losses of revenues due to high volatility of the national currency against reserve currencies are shifted in such cases on partners to the deal. In the present situation, it seems for Russian businessmen it is more preferable to carry out settlements in recognized reserve currencies or barter with estimation of the cost of goods to be exchanged in such currencies.

A lack of structural reforms is substituted for notorious "stimulating" target tax privileges. It is to be reminded that earlier decisions were taken as regards "tax holidays" for small and mid-sized business[1], "the amnesty of capital" and the mechanism of taxation of the profit of controlled foreign companies (CFC). At present, it is proposed to introduce again an investment incentive, that is, to grant entrepreneurs the right to reserve a portion of the profit before tax for subsequent investment in capital funds and intangible assets (that is, capital assets: machines and equipment and other, as well as purchasing of licenses and patents for production of goods which are in high demand and other). Generators of that idea are evidently primary products giants which take painfully the suspension of application of the mechanism of legal reduction of taxable profit till 2016 within the frameworks of the consolidated group of taxpayers (CGT) (by way of totaling of the profit and losses of formally independent legal entities – members of the consolidated group of taxpayers) which means for them that an obligation to pay a profit tax on all the revenues received (including an exchange rate difference) is renewed.

The President of the Russian Federation proposed that profile ministries and agencies should look into expediency of introduction of an investment incentive. The Ministry of Economic Development of the Russian Federation supported that incentive, while the Ministry of Finance opposed it. Let's explain the position of the Ministry of Finance of the Russian Federation as, in our view, it is economically justified.

An introduction of an investment incentive may result in a double reduction of the tax base in respect of the amount of the same costs: in the form of reservation of amounts within the frameworks of the investment incentive and in subsequent attribution of the amount of depreciation to costs. So, in granting of an incentive it will be important to specify in the tax legislation that as regards payment of capital assets and intangible assets out of the investment reserve they are not subject to depreciation. Unlike the investment reserve, depreciation suggests regular attribution of the expenses to reduction of the profit tax base which situation makes the revenues base of budgets stable. Introduction of the investment incentive may result in unpredicted fluctuations of the profit tax base and destroy stability of the revenues base of regions.

It is to be noted that the issue of system reduction of a tax burden on business is not discussed at all – it requires solution of the issue of preliminary reduction of budget expenditures: reduction of the number of personnel and modification of the structure of the state machine, primarily, by way of narrowing of the supervising and controlling blocks, reduction of the sphere of state procurement, raising of the pension age, abolishment of all the privileges and special regimes, revision of the special status of state-owned corporations and other.

Taking into account the above, it would be expedient to analyze *the documents* approved in the period under review *by the following lines*:

1) regulatory acts which reflect new trends and/or contribute to development of market relations which require updating of the tax legislation and/or approval of new schemes taxation;

2) regulatory acts regulating legal issues which have an effect on procedures and time-limits of recognition of units and/or base of taxation;

3) amendments to the tax legislation;

4) other documents on taxation issues.

In the period under review, the following documents can be attributed to *regulatory documents which develop such rules of interaction between the state and the business on the domestic market as may have an effect on creation of new organizational schemes which are to be taken into account in the taxation system, as well:*

1. Resolution No.708 of 16 July 2015 of the Government of the Russian Federation introduced the procedure for entering into special investment contracts. The parties to the contract are the Russian Federation represented by the Ministry of Industry and Trade of the Russian Federation or other authorized ministry (agency), constituent entity of the Russian Federation or municipal entity, on one side, and a legal entity (individual) (hereinafter, the investor), on the other side. The investment contract provides for the investor's obligation as regards creation and/or modernization of production with detailed specification of the investment project, volume and schedule of investments, categories and volumes of products to be made, the pay-off period, the share of the cost of input foreign materials and components (equipment) in the price of the industrial products; the number of created jobs; the volume of taxes subject to payment upon completion of the contract; and obligations of state (municipal) authorities as regards facilitation on the part of government entities of implementation of the investment project and selection of the most preferable measures – provided for by the legislation – of support of the project in that concrete case. Investments

1 By Resolution No.702 of 13 July 2015 of the Government of the Russian Federation, the ultimate values of the revenues for attributing economic entities to the category of small and mid-sized business entities were increased by 100%: microenterprises – up to Rb 120m, small enterprises – up to Rb 800m and mid-sized enterprises – Rb 2bn.
The definitions of the small and mid-sized business were specified by Federal Law No.156-FZ of 29 June 2015.

in the project should amount at least to Rb 750m. The contract is concluded for the period which is equal to that within which the investment project starts to yield the specified operating profit in accordance with the business plan of the investment project extended by five and maximum ten years. The due diligence of the project is to be carried out beforehand.

Conclusion of investment contracts permits to ensure a system development of a region, so despite introduction of the additional administrative mechanism of approval of the subject of business activities with state and municipal entities, in our view, such an approach is justified in general.

2. By Federal Law No.270-FZ of 13 July 2015, the list of founders of investment funds (they include legal entities and individuals), as well as sources and methods of financing of those funds was expanded. It is believed that due to introduction of amendments it is important to liberalize taxation of founders of such funds by equaling investments in such funds with research related expenditures.

3. In the business environment, there are other trends which are worth paying attention to. Due to sanctions, some representatives of the big business have limited opportunities of making commercial investments abroad and express their readiness to implement at their own account large socially significant and infrastructure projects of federal and/or regional importance in Russia (for example, a number of laws on regulation of land relations due to preparation to building of the Kerch bridge was approved[1]). Probably, "a patronship" is coming back in fashion, that is, due to a lack of sufficient funds with the state the big business is prepared to spend its own funds on those goals which it believes are of high importance for development of Russia, but at the same time representatives of the big business would like relevant projects to be associated with their names. Taxation of such projects and recognition of costs related to them within the frameworks of other commercial projects for the purpose of reduction of the total tax burden on entrepreneurs is not resolved yet.

4. The efforts on commercialization of state investments have become more active. By Federal Law No.235-FZ of 13 July 2015, amendments were introduced into the Federal Law on the ERA-GLONASS State Automated Information System. It is expected to establish a joint-stock company with 100% state participation for development of the ERA-GLONASS navigation system. The property complex of the system is assigned to the charter capital of the joint-stock company. An option is envisaged to finance maintenance and operation of the system at the expense of extra-budgetary sources. It is believed that in future the funds spent by the government may be partially returned either by way of sale of a portion of equities or the company's capital is increased through additional placement of the company's equities on the financial market. In realization of equities on external markets, it is important to determine in advance the taxable base; it is to be noted that funds attracted through the IPO may happen to be much below the balance-sheet value of the ERA-GLONASS. It should be considered as a reduction of capitalization and not operating losses of the joint-stock company. In future, the tax on the difference between the price of purchasing of an equity under the IPO and the price of sale of it by the new shareholder will be paid to the budget at the place of tax registration of that shareholder (except for the situation where real property units situated in the Russian Federation account for over 50% of the company's capital; for the above reason it is necessary to solve the issue of making space communication device equal to real property items within the frameworks of a double taxation agreement so that the tax on the price difference of equities circulating on the market is paid to the budget of the Russian Federation).

Summing up the above, it should be noted that there is a problem of inefficient methods of tax regulation of different types of long-lasting investment projects; in reality only the format of special economic zones – which format is not acceptable for regions – is applied. It is believed that it is important to include in the Tax Code of the Russian Federation the scheme of taxation of investment funds and that of accounting of revenues and expenditures for the purpose of taxation of founders of those funds, funds themselves and recipients of cash from those funds. It is necessary to formulate the principles of taxation of concessionary projects which income is formed irregularly. It would be expedient to form a procedure for recognition for the taxation purposes expenses on particularly large state projects carried out by private investors at their own account. Also, it is important to determine the rules of taxation of equities of companies with state participation at their first placement on the free financial market and subsequent sales.

5. Such federal laws as Federal Law No.223-FZ of 13 July 2015 on Self-Regulating Entities in the Sphere of the Financial Market and on Amendment of Article 2 and Article 6 of the Federal Law on Amendment of

1 See Federal Law No.221-FZ of 13 July 2015 on the Specifics of Regulation of Individual Legal Relations which Arise Due to Building and Restructuring of Transportation Infrastructure Projects of Federal and Regional Importance Meant for Ensuring a Transport Service Between the Taman Peninsula and the Kerch Peninsula and Utility Infrastructure Projects of Federal and Regional Importance on the Taman Peninsula and the Kerch Peninsula and on Amendment of Individual Statutory Acts of the Russian Federation.

Individual Statutory Acts of the Russian Federation contribute undoubtedly to development and strengthening of the most crucial principles of formation of the domestic market.

What is meant here is expansion of self-regulating entities (SRE) in the financial sector, including brokers, dealers, depositaries, insurance institutions, micro-financial institutions, pawnbroker's offices and other. A SRE can be formed in respect of one or several types of activities of financial institutions. For registration of SRE, it should unite at least 26% of the total number of institutions engaging in a specific type of financial activities on the Russian market and have business organization standards approved by the Central Bank of the Russian Federation. The Central Bank of Russia may assign a portion of supervising functions to SRE.

6. It is to be noted that strong centralization of power sometimes slows down development of free market relations. For example, amendments introduced by Federal Law No.211-FZ of 13 July 2015 to the Federal Law on the Federal Budget in 2015 and the 2016-2017 Planned Period are questionable. The above amendments provide for granting to the Deposit Insurance Agency (DIA) of the right on behalf of the Russian Federation at the expense of the property contribution of the Russian Federation to the DIA in the amount of over Rb 60bn to buy in ownership of the Russian Federation equities of the PAO State Transportation Leasing Company and the OAO Russian Networks Company.

The Agency was established in accordance with Federal Law No.177-FZ of 23 December 2093 for protection of the interests of individuals-depositors of commercial banks and managed by the Board of Directors of the Agency (Article 18), which includes along with the representatives of the Government of the Russian Federation (7 persons) representatives of the Central Bank of the Russian Federation (5 persons) and the Director of the Agency (1 person). So, decisions of the DIA are virtually determined by the Government of the Russian Federation. It is unlikely that the Board of Directors of the Agency in which the number of representatives of the RF Government[1] prevails will not take advantage of the right granted to it to reassign in 2015 the funds contributed to the property of the DIA (in the form of OFZ) for protection of the interests of depositors in case of a bank failure to financial support of the PAO State Transportation Company and the OAO Russian Networks Company by acquiring additionally placed equities of the above companies "in ownership of the Russian Federation"[2].

It is evident that the legislators tried to "invent" a scheme of additional state financial support of the above PAO and OAO using the right granted to the Agency to make investments in equities of OAO and Article 7.1 (3) of Law No.7 of 12 January 1996 on Non-Profit Organizations; under the above article the DIA as a non-profit organization has the right to make decisions on assignment of a portion of the property of the state-owned corporation into the state treasury of the Russian Federation. But in practice, it is no good: under the law the Agency is instructed at the expense of its *own* funds to pay for the equities of the above PAO and OAO acquired in ownership of the Russian Federation. According to the law, it is prohibited to have those equities on the balance sheet of the Agency, so such expenditures cannot be regarded as investments by the Agency. In our view, in the text of amendments to the Law on the Federal Budget there is a legal error which needs to be explained by judicial authorities. In moral and ethical terms, the developed scheme of support of PAO and OAO is not quite a good one: through representatives of the Government of the RF in the board of directors of the DIA the state arranges a voluntary return by the Agency of over Rb 60bn worth of its own funds to the state treasury instead of paying those funds to households; it is to be noted that the DIA has spent recently almost all its funds due to a series of bankruptcies of quite large commercial banks. Delays in reimbursement of deposits with failed banks may result in social tensions.

Regulatory documents *which influence the procedures and time-limits of origination and/or adjustment of tax obligations* include the following.

7. An important line of identification of real-property units is registration of titles to those units. Such a registration is an important requirement for origination of tax liabilities with owners of real property.

By federal law No.251-FZ of 13 July 2015, amendments were introduced into federal laws on state registration of titles to real property and operations with it (Article 16 of Federal Law No.122-FZ of 21 July 1997) and on the state cadaster of real property (Article 46 of Federal Law No.221-FZ of 24 July 2004). In particular, it is provided for by the legislation that if within five years from the date of assignment of cadaster numbers to earlier registered buildings, constructions, facilities and incomplete construction units there is no information on titles to such units in the state cadaster of real property, the authority which is in charge of cadaster

1 The representatives who attend the Council not as private persons, but as representatives of the Government of the Russian Federation are obligated to fulfill decisions taken by the Government of the Russian Federation.

2 The property of the Russian Federation is managed only by the Rosimuschestvo of the RF.

registration is to provide within 10 business days upon the expiry of the above five-year period the information on such units to the authorized local government authorities, while in cities of federal importance, to authorized state body of the respective constituent entity of the Russian Federation – a city of federal importance (Moscow, St. Petersburg and Sevastopol).

According to experts, the norm introduced creates grounds for initiation by relevant authorized authorities of the procedure for recognition of real property units as vacant ones in accordance with the established procedure. As a result, within five years it will be possible to identify completely owners of all the real property units and land plots and identify vacant units so that they could be integrated in the economic turnover.

It is believed that the above decision on the ultimate time-limits for identification of owners of real property units and land plots is crucially important for development of free market relations in Russian regions and strengthening of the regional and local budgets' own tax base.

8. Resolution No.25 of 23 June 2015 of the Plenum of the Supreme Court of the Russian Federation in which the time-limits were set for recognition of unaccomplished projects as real property in respect of which a tax liability arose serves the same purpose. The project is recognized as real property if there is a building base. Paving of a land plot is not a real-property as it cannot be regarded as a construction.

9. Provisions on recognition of an entity as bankrupt if upon the expiry of a three-month period after a relevant court decision wages or lay-off benefits were not paid – which provisions were introduced by Federal Law No.186-FZ of 29 June 2015 – contribute to higher turnover of the real property, as well as capital assets and intangible assets.

10. Changes provided for by Federal Law No.259-FZ of 13 July 2015 contribute to reduction of red-tape procedures. According to the above changes, in servicing of customers credit and insurance institutions and notaries are now entrusted directly with the responsibility to receive extracts from the Unified State Register of Titles to Real Property and Transactions with It and the State Cadaster of Real Property.

As regards *tax privileges* adopted in the period under review, they either envisage a voluntary refusal by regional budgets from a portion of the revenues collected in the territory of the region or compulsory cuts of revenues to regional budgets and social funds without any compensation. Here are some examples.

11. By Federal Law No.232-FZ of 13 July 2015, state authorities of constituent entities of the Russian Federation and representative authorities of municipal entities are granted the right to reduce tax rates in respect of taxpayers using a simplified scheme of taxation to 6% (if the tax unit is revenues), 5–15% depending on the categories of payers (if the tax unit is the difference between the revenues and expenditures) and 0% (within the first two years) for individual entrepreneurs who are registered for the first time as taxpayers and carry out business activities in production, social and (or) research spheres.

As regards taxpayers who use the single tax on the imputed income (STII), the right was granted to set the rates from 7.5% to 15% depending on the category of taxpayers and types of business activities and other.

12. By Federal Law No.213 of 13 July 2015, tax exempts were introduced as a result of granting by Federal Law No.212-FZ of 13 July 2015 to the seaport of Vladivostok of the status of "the free port". For legal entities and individual entrepreneurs who received the status of a resident of a free seaport of Vladivostok in accordance with the Federal Law on the Free Seaport of Vladivostok application of the tariff of insurance contributions to the Pension Fund of Russia (PFR), the Social Insurance Fund (SIF) and the Federal Fund of Mandatory Medical Insurance (FFMMI) in the amount of 6%, 1.5% and 0.1%, respectively in 2015 and the next nine years was envisaged.

The shortfall in revenues of state extra-budgetary funds due to application of reduced tariffs of insurance contributions in respect of payers of insurance contributions – residents of the free seaport of Vladivostok is compensated by means of inter-budget transfers allocated out of the federal budget.

At the same period, by Federal Law No. 178-FZ of 29 June 2015 tax privileges were established as well for those residents of the special economic zone of the Kaliningrad Region which carry out investment projects in accordance with Federal Law No. 16-FZ of 10 January 2006 on the Special Economic Zone in the Kaliningrad Region. During the first six years, for those who have got the status of a resident of the special economic zone the profit tax rate is set in the amount of 0% on profit from realization of the investment project, while in respect of the subsequent 6 years the general profit tax rate reduced by 50% is applied to such a project.

From among *other* documents on tax issues, it would be expedient to single out the following.

13. By Resolution of 14 July 2015 of the Constitution Court of the Russian Federation, the issue of the ratio of administrative measures and criminal responsibility measures for one and the same violation was explained. The Constitution Court of the Russian Federation recognized that Article 31.7 (2) of the Administrative Offences Code of the Russian Federation was incom-

patible with the Constitution of the Russian Federation (Article 15 (1) and (2) and Article 54) to the extent it allows that suspension of fulfillment of the resolution on imposition of administrative punishment for committing of an administrative violation (in case it is abolished by the law) is simultaneously accompanied by imposition of criminal responsibility for that violation. It is to be noted that the Constitution Court of the Russian Federation does not exclude the legal authority of the federal legislator to envisage in such situations by means of relevant laws transitional provisions which regulate the issue of further fulfillment of earlier approved resolutions on imposition of administrative punishment.

14. By Resolution No.19-P of 1 July 2015 of the Constitution Court of the Russian Federation, the issue of non-application of the value added tax (VAT) to amounts of insurance indemnity paid under agreements on insurance against the risk of a failure to fulfill contractual obligations by the counterparty of the insurant-creditor if the insured contractual obligations provided for delivery by the insurant of goods (jobs and services) which realization is recognized as a tax base was explained.

The Constitution Court of the Russian Federation explains that earlier the tax base as regards the VAT was formed on the basis of the cash method, that is, upon payment. Application of insurance schemes permitted to reduce the amount of revenues for taxation purposes and, accordingly, the price of the delivered goods by way of transferring a portion of the payment into insurance indemnity for a violation of a parameter of the delivery (for example, time-limits). Measures aimed at elimination of similar schemes can be found in Article 162 (1) of the Tax Code of the Russian Federation.

The effective tax legislation provides for origination of tax liabilities on the basis of the fact of shipment. So, no additional increase in the tax base on the amount of insurance received is required for justified calculation of the VAT. The Constitution Court of the Russian Federation has ruled that the above norm is not compatible with the Constitution of the Russian Federation and suggested that legislators should introduce relevant specifications into the Tax Code of the Russian Federation.

15. By Resolution No.16-P of 25 June 2015, the Constitution Court of the Russian Federation explained the provisions of the Tax Code of the Russian Federation as regards application of the status of a tax resident to a foreign national who worked in the Russian Federation under a labor contract.

The Constitution Court explained that at present deemed as tax residents were individuals who actually stayed in the Russian Federation for minimum 183 calendar days during 12 subsequent months. Residents are obligated to pay a tax on income received both from sources in the Russian Federation and beyond. Persons who are not tax residents of the Russian Federation are recognized as payers of that tax only as regards incomes received from sources in the Russian Federation.

In general, the tax rate for residents is set in the amount of 13%, while for individuals who are not tax residents of the Russian Federation, at the amount of 30%.

The tax status of an individual is determined correctly as of the beginning of the fiscal period, however, at the end of each fiscal period it is to be specified depending on actual continuation of that individual's stay in the Russian Federation in that fiscal period. Specification constitutes grounds for recalculation of the individual income tax paid at the maximum rate (30%) as of the beginning of the current fiscal period and return of the overpaid amount in case of a change in the status of the payer (receipt of the status of a tax resident) and origination of the title to application of the general tax rate (13%) as of the end of the fiscal period. Refund is carried out on the basis of the taxpayer's tax return, as well as documents which confirm the status of the tax resident of the Russian Federation in the relevant fiscal period.

The Constitution Court of the Russian Federation explained that the provision in the Agreement between the Government of the Russian Federation and the Government of the Republic of Belarus – which provision envisages a feasibility to apply tax rates set in respect of residents' income to individuals working on a labor contract, as well– actually requires that such individuals should secure first the status of a tax resident of the Russian Federation in accordance with the standard procedure. The main condition for application of the tax regime which is applied to residents is continuation and duration of work under a labor contract for at least 183 days and not the simple fact of existence of the labor contract.

16. By Letter No. ID-4-3/12317@ of 14 July 2015 of the Federal Tax Service, control ratios of the indices of a tax return as regards the profit tax were reported through the system. The letter includes instructions as to what is to be done by tax authorities if the specific control ratio in the tax return is not complied with (for example, sending of a request for provision within 5 days of explanations and corrections. In case of absence of explanations and corrections, a statement with specification of the fact of violation of the legislation on taxes and duties is drawn up).

17. By Letter No. GD-4-3/11229 of 26 June 2013 of the Ministry of Finance of the Russian Federation,

detailed explanations as regards calculation and payment of the sales tax provided for by Chapter 33 of the Tax Code of the Russian Federation and included in the Tax Code of the Russian Federation by Federal Law No. 382-FZ of 29 October 2014, registration and deregistration of the payer were given. Also, other issues related to control and reporting on payment of the tax and other were explained.