Romania amends tax debt restructuring programme

On 8 July 2020, the Romanian parliament issued Law no. 114/2020 (Law 114/2020) for the approval of Government Emergency Ordinance no. 90/2020 (GEO 90/2020), regarding the tax debt-restructuring programme introduced by the Romanian government in 2019.

Law 114/2020 entered into force on 11 July 2020. (Details on the initial programme may be found here.

The application of the tax debt-restructuring programme was extended as part of the Romanian government's response to the corona virus crisis.

Through Law 114/2020, the tax debt-restructuring programme has been extended for the fiscal periods up to 31 July 2020 and can be applied for any principle tax liabilities that are outstanding on 31 July 2020, and for accessory tax liabilities. Taxpayers that intend to employ this measure must notify the competent tax authority in writing by 30 September 2020 and submit a request for debt restructuring before 31 December 2020.

In regard to requests for debt restructuring submitted before GEO 90/2020 entered into force, Law 114/2020 provides that these requests should be settled based on the legal provisions in force at the time of submission. Also, taxpayers may opt to update the restructuring plan by including their outstanding tax liabilities as of 31 July 2020 and then re-submit the request by 31 December 2020. In order to update the restructuring plan, taxpayers must submit a request to the relevant tax authority by 21 July 2020.

For more information on how you can apply for the tax amnesty measures detailed above, contact our CMS experts **Roxana Popel**, **Andrei Tercu** or **Ramona Tudor**.