

**Executive Summary**  
**of the Opinion of the Romanian Chamber of Deputies on**  
**Communication – building a fair, competitive and stable corporate tax system for**  
**the European Union – COM (2016) 682**  
**Proposal for a Council Directive on a common consolidated corporate tax base**  
**(CCCTB) – COM (2016) 683**  
**Proposal for a Council Directive on a common corporate tax base – COM (2016) 685**

The Chamber of Deputies:

- welcomes the awareness of the need to reform the corporate tax system and notes, in principle, the validity of the European Commission's action, but does not support the introduction of a comprehensive and complex set of rules and provisions to facilitate cross-border trade and abolish tax obstacles (over taxation or lack of loss offset) in the internal market;
- welcomes the Commission's willingness to provide guidance and support to Member States for a common EU approach to corporate taxation;
- supports, in principle, the proposed approach but has reservations for the second phase-consolidated tax base, given the potential impact on national budgetary revenues in certain Member States;
- believes that it is necessary to continue detailed examination of the two proposals for a directive, both in terms of the potential budgetary impact and in terms of their actual implementation and hopes for sufficient changes in the adoption process in order to allow the establishment of a viable mechanism.
- notes that it is implicitly acknowledged the insufficiency of the adopted measure so far and there is awaiting on the effectiveness of the additional measures promoted in those two proposals;
- considers appropriate to create a better and more efficient company-friendly fiscal environment for which a single corporate tax system is needed and a simple, robust and temporary system of cross border loss offset within the common base; the new system should lead to combatting fiscal abuse, to ensure sustainable Member States revenues and to support business environment improvement on the single market;
- supports the introduction of incentives for research and development and a certain deduction for growth and investments; following Romanian experience, considers that, for unitary qualification in all Member States of research-development activities and for uniform implementation of tax system set up by Directive CCTB, it is necessary the certification of those activities by the national competent authority; considers necessary the need to introduce a provision defining the types of expenditure eligible for the proposed tax relief; for comparable tax outcomes in the uniform application of the incentive for research-development in all Member States, does not support the proposed approach which allows to maintain a national fiscal incentive in the form of tax credit or

to opt for over-deduction for research-development, and considers appropriate the incentive provided under fiscal over-deduction from the tax base for research-development, which allows uniform application in all Member States and provides comparable fiscal outcome between taxpayers / Member States.