

?????????? ????????

?????? ??? ?????????? (?????? ????)

??? 17?? ???????? 2024 (\*)

« ?????????????? ?????????? – ?????????? – ?????? ??????? ?????? ?????????????????? ?????? (???) –  
?????? 2006/112/?? – ????? 14 ??? 15 – ??????? ?????????? ?????????? – ??????? ?????  
????????????? ??? ?????????? ??? ??????? ??? ?????? ?????? ??? ?????????? ?? ??????  
????????? ??????? ?? ????? ?????????????? ?????? ?????? – ?????????????? ???  
?????? ??? ??? ?????? ??? – “????????? ??????” – ?????????? ??? ????  
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???? ??????? C?60/23,

??. ?????????? ?????? ?????????????? ?????????? ??????? 267 ????, ???  
?????? ?? Högsta förvaltningsdomstolen (?????? ?????????? ??????????, ???????) ??  
?????? ??? 3?? ?????????? 2023, ? ????? ?????? ??? ?????????? ??? 6 ??????????  
2023, ??? ??????? ??? ????

**Skatteverket**

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**Digital Charging Solutions GmbH,**

??. ?????????? (?????? ????),

????????? ??? ??? I. Jarukaitis, ??????? ??? ??????? ???????, ?????????????? ???  
?????? ???????, ?. ?????? (???????) ??? E. Regan, ????????,

?????? ??????????: T. ?apeta

?????????: A. Lamote, ?????????? ????????,

?????? ??? ??? ?????? ?????????? ??? ??????? ??? ??' ?????????? ??? ?????????? ???  
?? ?????????? 2024,

????????? ??? ??? ?????????? ??? ??????:

- ? Skatteverket, ?????????????? ??? ??? A.?S. Pallasdies,
- ? Digital Charging Solutions GmbH, ?????????????? ??? ??? U. Grefberg,
- ? ??????? ???????, ?????????????? ??? ??? H. Eklinder ??? F.?L. Göransson,
- ? ??????? ???????, ?????????????? ??? ?? Zs. Biró-Tóth ??? ??? Z. Fehér,
- ? ??????? ???????, ?????????????? ??? ??? M. Björkland ??? M. Herold,

???? ?????? ?? ?????? ???????????, ??? ??????? ?? ?????????? ??? ????? ?? ???????  
??? 25?? ??????? 2024,

?????? ?? ??????

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1 ? ??????? ?????????????? ?????????? ??? ??????? ?? ??????? 14 ??? 15 ???  
?????? 2006/112/?? ??? ???????????, ??? 28?? ?????????? 2006, ??????? ?? ?? ???  
?????? ??? ?? ?????????????? ??? (?? 2006, L 347, ?. 1), ??? ?????????????? ?? ??  
?????? 2009/162/?E ??? ??????????, ??? 22?? ?????????? 2009 (?? 2010, L 10, ?. 14) (???  
????: ?????? 2006/112).

2 ? ??????? ??? ?????????? ??? ??????? ??????? ??????? ??? Digital Charging  
Solutions GmbH, ??????? ?????????? ???????, ??? ??? Skatteverket (?????????? ??,  
??????) ??????? ?? ?? ??? ????? ?????????? ?????????? ??? ??????? ?? ?? ??????? ??  
?????? 2022 (?? ????: ?????????? ?????????? ???????).

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3 ?? ????? 1, ?????????? 2, ??????? ??????, ??? ?????? 2006/112 ?????????? ?? ???:  
«?? ????, ? [????? ?????????????? ??? (??)], ??? ?????????? ??? ??????? ??  
?????? ? ??? ???????, ?? ??? ?????????? ??? ?????????? ??? ??????? ?? ??  
????????? ???, ????? ?????????? ??? ??? ??????? ??? ??????? ?? ?? ???, ? ??????  
????????? ??? ?? ?????? ??? ??????? ??????????, ?? ????? ?????????? ??? ???..»

4 ??? ?? ????? 2, ?????????? 1, ??? ??????? ????:

«???? ?? ?????????? ?? ??????? ????:

? ) ?? ?????????? ??? ?????? ??? ?????????????? ?? ??????? ?????? ??? ?????? ???  
?????? ??? ?? ?????? ??? ?????????? ??? ?????? ??? ?????? ?? ?? ??? ??????? ???,  
[...]

? ) ?? ??????? ???????, ??? ?????????????? ?? ??????? ?????? ??? ?????? ???  
?????? ??? ?? ?????? ??? ?????????? ??? ?????? ??? ?????? ?? ?? ??? ??????? ??? ???,  
[...]».

5 ?? ????? 14 ??? ?? ??? ??????? ????:

«1. ?? “????????? ??????” ?????????? ? ?????????? ??? ?????????? ?? ??????? ??? ???????,  
?? ??????, ??????? ????.

2. ??? ?? ??? ?????? ??? ?????? 1, ?? ??????? ??????? ?? ??????? ??? ???????:  
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[...]

? ) ? ?????????? ????, ? ?????? ?????????????? ?? ??? ?????? ??? ??????? ???

????? ? ??????.

[...]»

6      ??? ? ???? 15, ?????????? 1, ??? ???? ??????:

«????????????? ?? ??????? ?????? ? ?????? ??????????, ?? ?????, ? ?????????? ? ?? ??????  
?? ??????? ?????..»

**?? ??????? ??????**

7      ?????? ?? ?? ????? 1, ????? ??????, ?????? 1, ??? ?????????? 1 ???  
mervärdesskattelagen (1994:200) [????? (1994:200) ??? ??? ??? ?????????????? ???], ???  
30? ?????? 1994 (SFS 1994, ????. 200) (??? ????: ?????? ????, ??? ?????????? ??? ??  
????????????? ?????????? ?????? ? ?????? ?????????? ??? ?????????????? ?????? ???  
????????? ?????????? ??? ?????????? ?????? ??? ?????? ?????? ?????? ??? ??? ?????????? ???  
????.

8      ?? ????? 6 ??? ??? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?? ??????  
????????? ?? ??????? ???????????, ?????????????????? ??? ??????????, ?? ??????, ?  
?????????, ?? ?????? ??? ?? ?????????? ??????. ?? ?????? ??? ?????????? ??? ?? ??????  
????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

9      ?? ????? 1, ????? ??????, ?????? 1, ??? ?????????? 2 ??? ?????? ??? ??? ?????? ???  
?? ??????? ??????, ?????? ???, ? ?????????? ?????? ?? ?????????? ??????, ??  
?? ????? 1, ????? ??????, ?????? 1, ??? ????? ?????????? ?????? ??? ?? ??????  
????????? ?????? ? ??????, ?????????? ? ???' ?????? ????? ?????????? ?????????? ???  
????????? ?? ??????? ?????.

**? ??????? ??? ?????? ?????? ??? ?? ?????????? ??????????**

10     ? Digital Charging Solutions ???? ??? ?????? ??? ?????????????? ??? ??? ?????? ???  
??? ??????? ?????? ?????????? ??? ??????. ?????? ?????? ?????? ?????????? ??????????  
????????? ??? ?????? ?????????? ?? ?????? ?????? ?????????? ?????????? ?? ??????????  
????? ?????????? ?????? ?? ??? ?????? ??? ?? ?????????? ?????? ??? ?? ??????  
????????????? ??? ?????? ???, ? ?????????? ?????? ?????????? ?????????? ???  
????????????? ??? ?????? ??? ?????? ?????????? ???.

11     ? ?????????? ??? ?????? ?????????? ??? ?????????????? ??? ?? ??? ?????? ????  
????????? ??? ??? Digital Charging Solutions, ???? ??? ?????? ?? ??? ?????? ?????? ????  
????????? ?????????? ?????????? ?? ?????????? ?????? ?????? ?????????? ?????????? ??  
????????? ??? ?????? ??? ?????????? ?????? ??? ??????, ? Digital Charging Solutions ???? ???  
????????? ??? ?????? ??? ?????????? ?????? ??? ?????? ??? ?????????? ??? ?? ??????????  
????. ??? ?????????????? ? ??? ?? ??????, ?? ?????????? ?????????? ??? ?? ??? ??  
????? ?????????????? ??? ?????? ?????? ?????????? ?, ? ?????? ?????? ??? ?? ??????????  
????? ??? Digital Charging Solutions. ? ?????? ?????? ?? ?????? ???, ??? ?????? ???  
???, ??? ? ?????? ??? ?????? ?? ?????????????? ??? 30 ????.

12     ?????? ??? ?????????? ??? ?????? ?? ?????? ?????????????? ?????? ?????????? ???  
Digital Charging Solutions ??????, ?????? ?? ?????? ???, ?????? ?????? ??? ?????? ???  
?????????, ?? ?????? ??????, ??????, ??? ?????? ??? ?????????? ??? ?????????? ??????????  
????????? ???, ??????, ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????????? ??? ?????? ? ???  
?? ?????????? ??? ?????????? ?????????? ???, ??? ?????????? ??? ?????? ??? ?????? ??? ???

????????? ??? ?????? ??? ??? ?????????? ??????. ?? ?? ??? ????? ????? ?????????? ?????????? ???  
?? ?? ? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????  
? ????. ??? ?????? ?????? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??  
Digital Charging Solutions ????? ?? ?????? ?????? ?????? ??? ?? ?????? ?????? ??? ?????? ???  
??? ?? ?????? ?????? ??????.

13 ??? 14 ?????? 2021 ? Digital Charging Solutions ?????? ??? Skatterättsnämnden  
(????????? ?????????? ??????, ??????) ?????? ??? ?? ?????? ?????? ?????????? ??????????  
????????? ?????? ??????. ??? 8 ?????? 2022 ? ?????? ?????? ??? ?????? ?????? ??????????  
????? ?? ??? ?????? ?????? ??? ? ?????????????? ??? ??? Digital Charging Solutions  
????? ?????? ?????? ?????? ??? ? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??????????  
????????? ?????? ?????? ??? ?? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ??????????  
??? ??????.

14 ? ?????????? ??? ?????? ?????? ??? Högsta förvaltningsdomstolen (?????????  
????????? ??????, ??????), ?? ?????? ?????? ?? ?????? ??????????, ?????????? ??  
????????? ? ?????????? ?????????? ??????. ? Digital Charging Solutions ??????????  
????? ?????? ??? ?????????? ?????, ?????? ??? ?????? ?????? ??? ?????????? ??? ?? ???  
????????? ??????. ? Digital Charging Solutions ?????????? ?????? ??? ??????????  
????????? ??? ?????????? ?? ?????????? ??? ?????????? ??????, ?????? ? ??????  
????????? ??? ?????? ??? ? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??????,  
?? ?????? ??? ?????? ? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????????? ???  
?????.

15 ??? ?????????? ??? ??? ?????? ?????????????? ??????????, ? ?????????? ??? ??????  
??? ?????????? ?????????? ?????? ??? ?? ?????? ?????????????? ??????  
????????? ?????????? ?????? ?????? ??? Digital Charging Solutions, ? ????, ?? ??  
????? ???, ??? ?????????? ?????? ??????. ???????, ?????????? ??? ?????? ?????? ??????  
????????? ??? ?????? ?? ?? ??? ?????? ?????????????? ??? ?????? ?????? ?????????? ?? ???  
?????.

16 ???????, ??? ?????????? ??? ?????? ??? ?????? ?????? ?????????? ?????? ??? ? Digital  
Charging Solutions ?????? ??? ?????? ?????? ?????? ? ??? ?????? ??????????, ????, ??? ??  
????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ?? ??????????,  
?????????, ?????????? ?????, ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ??????  
????????? ??? ??? ?????? ?????????? ??????????, ??? ?????? ??????, ?? ??? ???  
????????? ??????????, ??? ?????????? ??? 6?? ?????????? 2003, Auto Lease Holland  
(C?185/01, EU:C:2003:73), ??? ??? 15?? 2019, Vega International Car Transport and  
Logistic (C?235/18, EU:C:2019:412). ? ?????????? ??? ?????? ?????? ?????? ??? ??  
????????? ??? ? ?????? ?????? ?? ?????? ?????? ??? ?????? ??? ?????? ?????? ??????, ??????  
?????, ??? ???????, ??? ???????, ?? ?????? ?????? ??? ??? ??? ?????? ??? ?????? ???  
????????? ???????.

17 ?? ?????? ??????????, ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????  
????? ???, ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ???  
????? ??????.

18 ??? ??? ?????? ???, ?? Högsta förvaltningsdomstolen (????????? ??????????  
?????????) ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?? ?????? ???  
????????? ?? ?????? ?????????? ??????.

«1) ?????? ? ?????? ??? ?????? ?????? ?????? ?????? ?????? ? ?????? ?????? ??? ??  
??? ?????? ?? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? 14,

?????????? 1, ??? ??? ?????? 15, ?????????? 1, ??? ?????? [2006/112];

2) ?? ?????????? ?????????? ?????????? ??? ????? ?????????? ??????, ?????? ?? ?????????? ??? ?????? ??? ?????????? ??? ?????? ?????????? ?????? ?????????? ?????? ?????????? ??????;»

??? ??? ?????????????? ??????????

??? ??? ?????? ?????????????? ??????????

19 ?? ?? ??? ????? ?????????? ????, ?? ?????? ?????????? ????, ???' ??????, ?? ?????????? ?? ?? 14, ?????????? 1, ??? ?????? 2006/112, ?? ?????????? ?? ?? ?????? 15, ?????????? 1, ??? ??????, ???? ??? ?????? ??? ? ?????????? ?????????? ?????? ??? ? ?????????? ?????????? ?????? ??? ? ?????????? ??????.

20 ?????? ?? ?????????? ???, ??? ?????????? ??? ?? ?????????? ??? ?? ?????????? ??? ?? ?????????? ??? ?? ?????????? ??????.

21 ?? ?????? 14, ?????????? 1, ??? ?????? 2006/112 ?????? ??? ?? ?????????? ??? ?? ?????????? ??? ?? ?????? ?????? ? ?????? ? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? (??????? ??? 20?? ??????? 2023, Dyrektor Krajowej Informacji Skarbowej, C?282/22, EU:C:2023:312, ??? 33 ??? ??? ?????????? ??????)).

22 ???????, ? ??? ??? ?????????? ??? ?????????? ?????? ?????????? ?????? ?????? ??? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? 15, ?????????? 1, ??? ?????? 2006/112, ?????????? ?? ?????? ?????? ?????? (??????? ??? 20?? ?????? 2023, Dyrektor Krajowej Informacji Skarbowej, C?282/22, EU:C:2023:312, ??? 38).

23 ??? ???????, ??? ??? ?????????? ?????? ?????? ??? ?????? ??? ?? ?????? ?????? ??? ?? ?????? ?????? ??? ?? ?????? 14, ?????????? 1, ??? ?????? 2006/112, ?? ?????????? ?? ?? ?????? 15, ?????????? 1, ??? ?????? 2006/112, ??? ??? ?????? ??? ? ??????.

??? ??? ?????????? ?????????????? ??????????

24 ?? ?? ?????? ?????????? ???????, ?? ?????? ?????????? ??????, ???' ??????, ?? ?????????? ?? ?? ?????? 14 ??? ?????? 2006/112, ?? ?????????? ?? ?? ?????? 15,

?????????? 1, ??? ???????, ??? ?? ?????? ??? ? ??????? ?????????? ?????????? ?? ???????  
????????? ??????? ??????? ??? ?? ?????? ?????? ?????? ?????? ?????? ?????? ??????  
?????????? ?? ??????? ?????????? ??? ?? ?????? ?????????? ?????? ??? ??????  
?????????? ??? ? ?????????? ?????? ?????????? ?????? ?????????? ??????, ??????, ??? ??  
????????? ?????? ??? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?? ??? ??? ??, ??  
??????, ??? ?? ?? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??  
????????? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????  
????????? ?????? ??????.

25 ?? ??????? ?????????? ???????, ?? ?????? ?????????? ?????? ??? ?? ??????? ???  
????????? ??????? ???????, ?? ??????? ?????? ??? ?? ?????? ?????? ??? ?? ??? ?????? ???????  
????? ??? ?? ?????? ?????? ??? ?????????? ???????, ??????? ?????? ??? ??????????????  
??? ??????? ?????????? ?? ??? ?? ?????? ?????? ?????????? ??? ?????? ?????????? ???  
??? ?????? 16 ??? ??????? ?????? ??? ?? ?????? ??? ?????? ?????, ?????????? ?????? ?????? ???  
????????? ??????, ? Digital Charging Solutions ??? ?? ??????? ?? ?????????? ??? ?????? ??????  
????? ??? ?????? ???????, ??? ?? ?????????? ??? ?????? ?????????? ?????? ?? ?????? ??????  
????????? ?????? ?? ??? ??????.

26 ??????, ?????????? ??? ? ?????? ??? «????????? ??????» ??? ?????????? ???  
????????? ??? ?????????? ??? ?? ?????? ??? ?????? ??? ?????????? ?? ?????????? ?????? ???,  
???? ?????????? ??? ?????? ?????? ?????????? ?????? ?????? ??? ?????????? ??? ? ??????  
????????? ??? ?????????????? ??? ?? ?????? ?? ?????????? ?? ?????? ?????? ?? ?? ???  
????? ?? ?????? (????????? ??? 18?? ?????? 2013, Evita?K, C?78/12, EU:C:2013:486, ???  
33, ??? ?? 21?? ?????? 2013, Dixons Retail, C?494/12, EU:C:2013:758, ??? 20).

27 ??? ?? ??????????, ???, ??? ?????????? ?? ??????? ??????? ?? ??????? ??? ?????? ???????  
?????, ??? ?? ?????? ??? ?????? 14, ?????????? 1, ??? ?????? 2006/112, ???  
????????? ? ?????????????? ??? ?????? ?????????? ?? ?????????? ?????? ?? ?? ??? ??? ??  
????? ?????? ???, ??? ?? ?????? ??? ?????? ?? ?????? ?? ?????? ?????????? ?????? ??? ?? ???  
????????? ???/? ?? ??? ?????? ?????????? ?????? ??? ?????? (????????? ??? 15?? ??????  
2015, Koela?N, C?159/14, EU:C:2015:513, ??? 38).

28 ??????, ??? ?? ?? ??? ?????? ?????? ?? ?????????? ?????????? ??? ??????????  
????????? ??? ?? ?????? ??? ?????? 14, ?????????? 1, ??? ?????? 2006/112, ???  
?????????????, ??? ??????????, ?????????? ??? ?? ?????? ?????? ?????? ??? ??????  
????????? (????. ?????? ??? 10?? ?????? 2019, Kuršu zeme, C?273/18, EU:C:2019:588,  
????? 36).

29 ?? ?????????? ??? ?????? ?????? ??? ?? ?????? ?????????? ???????, ? ?????, ??????? ??  
?? ?????????? ??? ?????? 22 ??? ?????? ???????, ?????????? ?? ?????????? ?? ?????????? ???  
?????? ??? ?????? 15, ?????????? 1, ??? ?????? 2006/112.

30 ?????? ??????????, ?????????? ?? ?????? ?????????? ??? ?????? ?????????? ??????????????  
??????, ?????? ?? ?????????? ??? ?????????? ?????? ?????? ??? ?? ?????????? ??? ??????  
????????? ??? ?????? ?? ?? ?????????? ?????? ?? ?????? ?????????? ??????????????, ? ??????  
????????????????, ???' ????, ??? ?????????? ?????????? (????. ?????????? ??? 20??  
????????? 1997, DFDS, C?260/95, EU:C:1997:77, ????? 23, ??? ?? 28?? ??????????  
2023, Fenix International, C?695/20, EU:C:2023:127, ????? 72 ??? ????? ??????????????  
?????????).

31 ??????, ??? ?? ?????????? ??? ?????? ?? ?????? ?????????? ?????????? ??? ??  
????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????????? ?????????? ??????  
????? ?? ??? Digital Charging Solutions ??? ???, ?????? ?? ??? ?????? ?????????? ??????????, ?

????????? ??? ?????? ?????? ??? ??????? ??? ?????? ?????????? ??? ?????? ?????????? ?? ?????????? ?????? ???  
????? ??? ??????? ?????? ?????????? ?????????? ??? ?????? ?????? ??? ?????? ?????? ???, ?????? ???,  
????????? ??? ?????? ?????? ?????? ?? ?????????? ?? ?????? ?????? ?? ?????? ?????? ?????? ???  
??? ?????? ??? ?????????? ?? ?? ?????? ??????. ??? ?????? ?????? ??? ?????? ?????? 11 ??? 12  
??? ?????? ??? ??????, ?? ?????? ?????????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ??????  
????????? ??? Digital Charging Solutions ?? ?????? ??? ?????????? ??? ?????? ???  
????????? ???' ?????? ??? ?????? ??? ? ?????????? ?????? ?? ?? ?????? ???, ?????? ???  
????? ???, ?? ?????? ??? ?????? ?????, ??? ?????? ?????????? ?????? ??? ??? ??  
????????? ??????, ??? ?????? ??? ?????? ??? ?????? ?? ??? ?????? ??? ?????? ??? ?????? ??? ??  
????????? ??? ?????????? ??? ?????????? ??? ?????? –???, ????????, ??? ?? ?????? ??? ??  
???? ?????????? ??? ??????– ??? ?????? ??? ?????? ??? ??????.

32 ??? ??????????, ???' ??????, ? ?????? ?????????? ??? ?????? 39 ??? ??????  
???, ?????????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??????????  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? 6??  
????????? 2003, Auto Lease Holland (C?185/01, EU:C:2003:73), ??? ??? 15?? ????? 2019,  
Vega International Car Transport and Logistic (C?235/18, EU:C:2019:412).

33 ??????, ?? ??? ?????? ?? ?????, ?????????? ??? ? ?????? ?????? ??? ??????  
????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ??????  
????????? ?????????? ?????? (leasing) ??? ???, ??? ?????? ???, ?? ?????????? ??? ??????  
????????? ?????? ??? ?????? ?? ?????? ???, ?? ?????? ??? ?????? ??? ?????? ??? ??????  
????? ?????????? ??? ?????? ??? ?????? ??????, ?? ?????? ?????? ??? ?????? ??? ??????  
????????? leasing ?????????? ??? ?????? ?????????? –????????? ??? ? ?????????? ??????????  
????????? ??? ?????? ??? ??????–, ?????? ??? ? ?????? ??? ? ?????????? ??? ?????? ???  
????????? ?????? ??? ?????? ?? ???, ??? ??? ?????, ?????????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? leasing, ??? ?????????? ???, ?????? ?????? ??? ??????  
??? ?????? (???. ?????? ??? 6?? ?????????? 2003, Auto Lease Holland, C?185/01,  
EU:C:2003:73, ?????? 35 ??? 36). ??? ?????? ?? ?????? ??? ?????? ??? ?????? ??????????  
????? ?? ?????? ??? ?????? ?? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??????  
????????? ??? ?? ?????? ?? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? (?????? ??? 15??  
????? 2019, Vega International Car Transport and Logistic, C?235/18, EU:C:2019:412, ??????  
14 ??? 36).

34 ? ?????? ?????????? ?????? ??? ?????? ?????????? ??? ?????? ?????? ??????????  
????????? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ??????????  
????? ??? ?????? ?????? ?????? ??? ?????? Digital Charging Solutions. ???????, ???  
????????? ??? ?????? 31 ??? ?????? ?????? ???, ? ?????? ??? ?????? ??? ?????? ?????? ???  
????????? ??? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ???, ??? ???  
????? ???, ?????????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ???  
????? ??? ? ??? ?????? ??? ??????.

35 ??????, ??????, ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ???  
????????? ??? 33 ??? ?????? ?????? ???, ? ?????? ?????? ??? ?????? ???, ??? ???  
?? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ??????.

36 ?? ??????????, ??? ?????? ?????? ??? ?????? ?????? ??? ?????? 52 ???

?????????? ??, ?? ??? ???? ?????????? ?????? ??? ?????? ?????????????????? ???????  
????????? ??? ??? Digital Charging Solutions, ??????, ??? ?????? ??? ?????????????? ??? ???  
????????? ??? ??????? ?????, ????????, ??????????????, ?????????? ?? ??? ?????????????? ???  
????????? ?? ?????? ???????????, ??? ? ?????? ?????? ?????????? ?????????? ??????? ??  
????????????? ??? ??????? ???, ??? ?????? ??? ?????? ?????? ?????????? ??? ?????????? ????. ?  
Digital Charging Solutions, ??? ??? ?????? ???, ??? ?????????? ?????? ?????? ??? ??????  
????????????? ??? ??????? ?????? ?????? ?????? ?? ????????, ?????????? ??? ?????????? ???  
??? ?????????? ??? ???????, ?????????? ?????? ?????????? ?????????? ?????????? ???, ???  
????????? ??? ??? ??? ?????? ?????? ?????????? ?????????? ?????????? ?????????? ???, ???  
?? ??? ??? ???????????.

37 ??? ??? ?????? ??????, ?? ?????? ?????????????? ??? ?????????? ?????? ??????? ??  
?? ?????????? ??? ?? ?????? ??? ?????? 14, ?????????? 2, ????????, ???, ??? ??????  
2006/112, ?? ?????? ?????? ?? ?????????? ?????? ??? ?????????????? ?? ??? ?????? ??????  
????????? ??? ?????? ?????? ?? ?????? ??? ?????? ???????, ?? ?????? ?? ??? ?????? ?????? ???  
????????? ?????? ??? ?????????? ??? ?????? 14, ?????????? 1, ??? ??????, lex specialis  
??? ?????? ?? ?????????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?? ???  
????????? ?????? ??? ?????????? 1 [???. ?????? ??? 25? ?????????? 2021,  
Gmina Wroclaw (????????? ??? ?????????? ?????? ?????? ?????????? ??????????),  
C?604/19, EU:C:2021:132, ??? 55 ??? ??? ?????????? ??????????].

38 ??? ??? ?????? ??? ?????? 14, ?????????? 2, ????????, ???, ??? ?????? 2006/112  
????????? ?? ?????????? ??? ?????????? ?????? ?????????? ???????, ?????  
????????? ??? ?????? ? ?????????? ?????????? ???????, ??? ?????????? ??? ???????, ???  
????????? ??????, ???, ???????, ?????? ?? ?????????? ?? ?????????? ??? ?????? ???  
????????? ??? ??? ?????????? ??? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ??? (???. ?????? ??? 12? ?????????? 2020, ITH Comercial Timi?oara,  
C?734/19, EU:C:2020:919, ??? 51).

39 ??? ?????????? ?? ??? ?????? ??????????????, ?? ?????? 14, ?????????? 2, ????????, ??,  
?? ?????? 2006/112 ?????? ???, ??? ?????? ??????, ???????, ?????????? ??? ??????????  
????????????? ?????? ?????????????? ???????, ?? ?????? ?????????? ??? ??????  
????????? ??? ??? . ?????? ??? ?????? ?????? ???????, ??? ?????????? ??? ?????? ???, ???  
???? ???????, ??? ?????? ??? ?????????? ???????, ?????????? ?? ?????? ??? ???????,  
????????? ??? ?????????? ??? ?????????? ?????? ??? ?? ??? ?????? ??? (???. ?????? ???  
12? ?????????? 2020, ITH Comercial Timi?oara, C?734/19, EU:C:2020:919, ?????? 49 ??? 50  
?? ??? ?????????????? ??????????).

40 ?? ??? ?????? ??????????, ?? ??? ?????? ?????????? ??? ?????? ??? ??????????????, ????  
?? ?? ??? 14, ?????????? 2, ????????, ???, ??? ?????? 2006/112, ??????????????  
????????? ??? ?????? ?????? ?????????? ???????, ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?? ?????????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ??????????  
????? (???. ?????? ??? 19? ?????????? 2009, Athesia Druck, C?1/08, EU:C:2009:108,  
????? 35 ??? 36).

41 ??????, ??????, ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????????? ??????  
????????? ?? ??? ?????? ?????????? ?????????? ??? ?? ?????? ?????????? ?????????? ?? ???  
? ?????? ??? ??????????, ??? ??????????, ??? ?????? ?????? ?????? ??? ?????? ??? ??????  
????? ??? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????????? ??? ??? ??? ???  
?????????.

42 ?? ??????????, ??? ?????? ?? ?????????? ?? ?????????? ?? ?????? ??? ??????  
?? ?????? ??? ?????? ?????????? ??? ?????? ?? ?????????? ?? ?????? ??? ??????

????????????? ?????? ??? ?????? ?????????????? ??? ?????? ?????? ?????? ?????? ?????? ??  
??????, ??? ??? Digital Charging Solutions, ?? ???????????, ??? ?????? ??? ?????? ?? ??  
???? ?????? ?????? ?????? ??? ?????? ?????????? ?? ?????? ?????????? ??????????, ??? ??????  
???? ??? ?????????? ???, ??? ?????? ?????? ?????????? ??????????. ?? ?????? ??????????, ??  
??? ?????????? ??? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????? ?? ?????? ??????????, ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????? ?????? ?????? ?????? ?????? ?? ?????????????? ?? ?????? ?????? ?????? ?????? ?????? ???  
????????? ?????? ?????? ??? ?????????? ?????? ?????????, ?? ?????? ?????? ?????? ?????? ??????  
Digital Charging Solutions, ?? ??????????, ??? ?????? ??? ?????? ?? ???? ?????? ?????? ??????  
????????? ?? ?????????? ??? ?????? ?????? ?????????? ?????? ?????? ?????? ?????? ?????? ???  
????? ?? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????????? ??? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???.

43 ???????, ??????? ?? ?????????? ???? ?????? ?????????? ?????????? ??? ?????? 14,  
????????? 2, ??????? ?, ??? ?????? 2006/112.

44 ??????? ?????? ?? ?????? ??? ?????????? ??? ???? ?????? ?????????? ?????????? ??? ??????  
?????, ??? ?????? ??? ?? ?????????? ??? ?????? ?? ?????? ?????????? ??? ?????? ?????????? ???  
??? ?????????? ??? ?? ?????????? ??? ?????? ?????? ?? ?????? ?????????? ???? ?????? ?????? ???  
????? ??????????.

45 ??????, ?????? ??? ???? ?????? ??? ???? ?????? ??? ?????? ?????? ?????? ??? ?????? ??  
????? ??? ?????? ?????????? ? Digital Charging Solutions ?????? ?????? ?????? ???  
????? ??? ?????? ?????? ?????????? ?????????? ?????? ?????? ?? ?????????????? ???  
????? ?????? ?????? ??? ???? ?????? ?????? ?????????? ??? ??? ?????? ?????? ?????? ?????? ???  
????? ?????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????? ?????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????? ?????? ?????? ??? ?? ?????????? ?? ?????? ?????? ?????? ?????? ?????????? ?????? ?????? ???  
????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???

46 ?????????? ??? ??? ?????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ??????????,  
????? ?? ?????????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ???  
????????? ?? ?????? ?????? ???, ??? ?????? ???, ?????? ??? ?????? ??? ???? ??? ???? ??????????  
????????? ?????? ???? ?????? ??????, ??? ?????? ???, ??? ?????? ??? ?????? ?????? ?????? ???, ?  
????? ??? ?????? ?????? ??? ?????? ?????? ?? «????????? ??????» ? ?? «????? ???? ??????»  
????? (????? ??? 20?? ?????? 2023, Dyrektor Krajowej Informacji Skarbowej,  
C?282/22, EU:C:2023:312, ??? 27 ??? ?????? ?????????? ??????)).

47 ???????, ??????? ?? ??? ???? 1, ?????????? 2, ??????? ??????, ??? ??????  
2006/112 ??????? ?? ??? ?????? ?????? ?????? ?????? ?? ?????? ?????? ?????? ???  
?????????, ? ???, ??? ?????????? ??????, ?????????? ?? ??? ?????? ?????? ?????? ???  
????? ?? ?????????? ??????, ?????? ?? ??? ?????? ?????? ?? ?????? ?????? ?????? ???  
????????? ??? ?? . ??????, ?????? ?? ??? ?????? ?????? ?? ?????? ?????? ?????? ???  
??? ? ?????????? ?????? ? ?????? ??? ?????? ?????? ?????? ?????? ??? ???? ?? ?????? ???  
????? ?????????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??? ???? ?? ?????? ???  
????? ?????? ?????? ??????, ??? ?????? ? ?????? ?????? ??? ?????? ?????? ??? ???? ?? ?????? ???  
??? 20?? ?????? 2023, Dyrektor Krajowej Informacji Skarbowej, C?282/22, EU:C:2023:312,  
????? 28 ??? ?????? ?????????? ??????).

48 ??????, ??? ?????? ?????? ??????????, ?????????? ?????? ?????? ?????????? ?????? ???  
?? ?????? ?? ?????????? ?? ?????????? ?????? ???, ?? ?? ??????, ?? ?????? ?????? ???  
????????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?? ?????? ??? ?????? ???  
?????, ?? ??? ?????? ?????? ?????? ???.

?????? ?? ??????? ?? ???? ? ?????????? ?????????? ?????????? ?? ?????? ?????? ??????, ???,  
???????????, ??? ??????? ?? ?????? ?? ???? ?????? ?? ??? ? ?????????? ?? ?????????? ???  
?????? ?? ??????, ??? ?????? ??????????, ?????????? ??? ?????? ??? ?????? ??????.  
???????????, ??? ?????? ?????? ?? ?????? ?? ?????????? ?? ?????????? ?????? ?????? ???  
????? ?????? ?????? ??? ?????? ??????, ??? ???? ?????? ?????? ?? ?????????? ??? ???  
????????? ?????? ??? ?????? ?????? (?????? ??? 20?? ??????? 2023, Dyrektor  
Krajowej Informacji Skarbowej, C?282/22, EU:C:2023:312, ?????? 29 ??? 30 ??? ???  
????????????? ??????????).

49 ??? ?????? ?? ?????????? ?? ???? ?????????? ?? ?????????? ?? ?????? 267 ???, ??????????????? ???  
?????? ?????????? ?? ??????? ???, ??? ??? ?????????? ??? ??????? ???????, ?  
?????? ?????? ??????? ?????? ?? ?????? ?? ???? ?????????? ??????? ?? ?????? ??? ??????????  
????????? ??? ?????? ?? ?????????? ?????????? ?? ??????? (?????? ??? 20??  
????????? 2023, Dyrektor Krajowej Informacji Skarbowej, C?282/22, EU:C:2023:312, ??? 31  
??? ??? ?????????? ??????). ??????, ??????? ??? ??? ?????????? ?? ???????  
??? ?? ??? ?????????? ??? ?? ??????? ?? ??? ?????? ??? ?????? ?????????? ?????????? ?? ???????  
????? ?????????? ?? ?????????? ?????? ??? ?? ?????????? ??? ?? ?????????? ??? ?? ?????????? ??  
????????????? (?????? ??? 18?? ??????? 2024, Companhia União de Crédito Popular,  
C?89/23, EU:C:2024:333, ??? 38 ??? ??? ?????????????? ??????????).

50 ?? ??????????, ??? ??????? ?? ?????? 12 ??? ?????? ???????, ? Digital Charging  
Solutions ?????? ??????? ?? ???????, ??????, ?? ?????? ??? ?????????? ????????  
??? ??????? ?? ??????? ?? ??????? ?? ???????, ??????, ??? ?????? ??? ??????? ?? ??????  
??? ?? ??????? ?? ??????? ?? ???????, ??? ???????, ??? ?? ??????? ?? ??????? ?? ??????  
??? ??????????? ?? ??????? ?? ?? ??????????????? ?? ??????? ?? ??????? ?? ??????? ??  
????????????? ?????????? ?? ?????????? ?? ??????? ?? ?????????? ??????? ?? ??????? ??  
???????????.

51 ??????, ??? ?????? ??? 30 ??? ??????? ???????, ?????????? ????????  
?? ??? ??????? ?? ??????? ?? ??????? ???????, ??? ?????? ???????????????, ???' ????, ??? ??????????  
?????????.

52 ??? ???????, ?? ??????? ?? ? ?????????? ?????????? ?????????? ?? ??????? ?? ??????? ?  
Digital Charging Solutions ??? ?? ??????? ?? ?????????? ?????????? ???????, ??? ?? ???  
?????? ??????? ?? ??????????????? ?? ????? 50 ??? ?????????? ???????, ??????? ?? ??????  
????? ??????? ?? ?????????? ?? ????? ?? ????? ?????? ?? ?????? ?? ??????? ?? ???????????,  
?????? ?? ??? ??????? ?? ?????????? ?? ???????????, ? ??????? ?? ??? ?? ??? ???????????  
?? ??? ?? ??? ???????.

53 ???????, ??? ?? ??????? ?? ?????????? ?? ?????????? ?? ?????????? ?? ???????,  
????????? ???, ??????? ?? ??????? ???????, ?????????? ???????, ?????????????? ?? ??????? ??  
????????? ? ?????????? ??????? ??????? ?? ?????? ?? ?????????? ??????? ?? ??????? ??  
????????? ??????? ??????? ???????, ?????????? ???????, ?????????????? ?? ?????????? ??????? ??  
????????? ?? (????. ??????? ?? 20?? ??????? 2023, Dyrektor Krajowej Informacji Skarbowej,  
C?282/22, EU:C:2023:312, ??? 32).

54 ???????, ??? ?????????? ?? ?????? ?????????? ?? ??????? 24 ??? 29 ???  
????????? ??, ??? ?????? ??????? ?? ??????? ?? ?????????? ?? ??????? ?? ??? ?? ?????? ??  
????????? ?? ?????? ?????????? ???????, ?????????? ?? ??????? ?? ??????? ??, ??????????  
????????????? ?????????? ?????????? ???????, ??????? ?? ?????? ?????, ??? ??  
????????? ?? ?????????????? ?? ??????? ?? ??????? ?? ??????? ???????, ??? ??

?? ????? ?????????? ?????? ??????? ?? ???????????? ?? ? ?? ?????????? ?????????? ??????????

55 ???? ???????, ??? ?????? ?????, ??? ?????? ?????????, ??? ?? ??????? ?????????? ??????????  
????? ?????? ?????????????? ?? ??? ?????????? ?????????? ?????????? ?????????? ? ??????  
????????????? ?? ?????? ?? ?????, ??? ? ?????????? ?????? ?? ?????? ? ? ?????? ??????????, ????  
????????? ?????, ? ?????????? ?????????? ?????????????? ?? ?????????????? ?????? ?? ?????? ??  
?????. ?? ??? ?????? ?????? ??? ?????????? ?????????? ??? ?????? ? ?????????? ? ?????????? ???  
????????????? ?????????? ?????????, ??? ?????????? ?? ?????????? ?, ?????????? ?? ?????? ?? ???  
????? ??? ?????? ?????? ??? ?????? ?????????? ?? ?????? Digital Charging Solutions, ?? ?????? ????  
??? ?????? ?????????? ?? ? ? ?????? ?????? ?? ?????? ???, ?????????? ?? ?????? ?? ?????? ?? ???  
????, ?? ?????? ????, ?? ?????? ?????????? ?? ?????? ?????????? ??????????, ??? ?????????? ????  
???? ?????? ?? ??? ?????????? ?? ?????? ?????????? ?????????? ?????????? ??? ?????????? ????  
????????? ?? ??? ?????? ??? ?????????? ?????? ??? ?????? ?????????? ?????????? ??? ?????????? ???.

56 ?????, ??? ? ?????? ??????? ?? ?????? ?? ?????????? ?? ? ?????? ??? ? ?????? ?????????? ???  
????????? ?????????????? ?? ?????? ?????? ???, ?? ? ? ??????, ? ?????? ?????????? ???  
????????? ?????????? ?????????? ?? ?????????? ?????????? ?? ? ?????? ?????????? ?????? ??? ???  
????????????? , ? ?????????????? ??? ? ? ?????? ?????????? ?? ?????????? ?????????? ?????????? ???  
????????? ?????????? ?????? ??? ?????? ?????? ?????? ?????????? ?????????? ?????? ??????????  
????????? ?????????? ?? ?????? ?????? ??? ?????? ?????? ?????????? ?????? ?????????? ?????????? ???  
?????????????????.

57 ??? ??? ?????? ?????, ??? ?????????? ? ?????? ?????????? ?????? ?????? ?????????? 68 ???  
????????? ???, ? ?????????? ?????????? ??????????, ??? ?????????? , ??? ??? Digital Charging  
Solutions ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ?????????? ?????????? ??? ????  
????? ?????????? ??? ?????? ?????????? ?????? ??? ?????? ??? ?????? ?????????? ???, ??? ??????????  
????????? ? ?????? ?????????? ??? ?????? 14, ?????????? 2, ?????????? ?, ??? ???????  
2006/12.

58 ?????, ?? ??? ?????? ??? ?????? ?? ?????????? ??? ? ?? ??? ?????? ?????????? ?????????? ???  
?????????, ?? ? ? ?????? ?????????? ??? ? ?????? ??? ? ?????? ??? ?????? ?????????? ? Digital  
Charging Solutions ?????? ?????? ??? ?????? ??? ?????? ???, ??? ?????? ?? ?????????????? ???  
????????? ?????? ??? ?????? ?????????? ?????????? ??? ?????? ???.

59 ?????, ??? ?????? ?????? ??? ?????? 47 ??? 48 ??? ?????? ?????????? ??????????, ????  
????????? ?????????????? ?? ?????????? ??? ? ?????????? ??? ? ?????? ?????????? ?????????? ???  
????????? ? ?????? ?????? ?? ?????? ?????????? ?????? ?????????? ?????????? ?? ? ? ??????????  
????????? ?????????? ? ?????? ?????????? ?? ?????? ?? ?????? ? ? ?????? ??????, ?? ? ? ???  
????????? , ?? ?????? ?????????? ??? ?????? ??? ?????? ?????? , ?? ?????????? ??? ?????? ???  
?? ?????? ?????? ?? ?????? , ??? ?????? ?????? ?????? ?????? , ??? ?????? ?????? ?????? ??????  
? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ???  
????????????? ??? ??? ?????? ?????????? ??? ?????? ?????? ?????? ??? ?????? ?????? ??? ??? ?? ???  
?????????.

60 ???? ?????? ??? ?????? , ??? ?????? ?????????? ?????????? ?????? ?????? ?? ?????? ?  
????????? ??? ? ???? 14 ??? ?????? 2006/12, ?? ?????????? ?? ? ? ???? 15, ??????????  
1, ??? ?????? , ??? ?????? ?????? ??? ? ?????? ?????????? ?????????? ?? ?????? ?????????? ??  
????????? ?????????? ??? ?????? ? ?????? ?????? ?????????? ??? ?????? ?????????? ?????????? ??  
????????? ?????????? ??? ?????? ?????? ?????????? ??? ?????? ?????????? ?????? ?????????? ??? ?  
????????????? ?????????? ?????????? ?????????? ??? ?????? ?????????? ?????? ?????? ?????????? ??? ?  
????????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????????? ??? ?????? ??? ? ????  
??? ??? ? ???? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ??, ?? ?????? ???,  
??? ??? ? ???? ?????? ?????? ?????? , ??? ??? ? ???? ?????? ?????? ?????? ??? ?????? ??, ?? ?????? ???,

? ??????? ? ?????? ??? ?? ???? ??????? ?????? ??? ?? ???? ?????? ??? ?? ???????????  
??????????, ??? ? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????????? ??? ??????  
??? ??????? ??????? ??? ??????, ??? ?? ?????? ??? ?????? 14, ??????????? 2, ??????? ??,  
??? ??????.

??? ?? ??????????? ????

61 ?? ??????? ??? ? ?????? ?????????? ??? ?? ??? ?????? ??????????? ??? ?????? ???  
??? ?????????? ?????????????? ??? ?????? ?????? ??? ?????????? ??? ???????????, ?' ???  
?????????? ?? ?????????? ??? ?? ?????????? ?????? ??????. ?? ?????? ??? ?????? ???????????  
??? ??????? ??????????? ??? ?????????? ??? ?????? ??? ?? ?????? ???????, ??? ???????????.

??? ?? ?????? ????, ?? ?????????? (?????? ????) ???????????:

1) ?? ??? 14, ?????????? 1, ??? ?????? 2006/112/?? ??? ???????????, ??? 28??  
????????? 2006, ??????? ?? ?? ?????? ?????? ?????? ??????????????? ????, ???  
????????????? ?? ?? ?????? 2009/162/?E ??? ???????????, ??? 22? ???????????  
2009, ?? ?????????? ?? ?? ?????? 15, ?????????? 1, ??? ?????? 2006/112, ???  
??????????,

???? ?? ?????? ????:

? ?????????? ?????????? ?????????? ??? ?? ?????? ?????????? ?????????? ??  
?????? ?????????? ?? ?????? ?????????? ?????? ?????????? ?????????? ?????????? ???????  
?????? ?????????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?? ?????????? ??????.

2) ?? ??? 14 ??? ?????? 2006/112, ??? ?????????????? ?? ?? ?????? 2009/162,  
?? ?????????? ?? ?? ?????? 15, ?????????? 1, ??? ?????? 2006/112, ???  
??????????,

???? ?? ?????? ????:

? ?????? ?????????? ?????????? ?? ?????? ?????????? ?????? ?????????? ?? ?????? ??  
????????? ??? ?????????? ?????? ?????????? ?????????????? ?? ?????????? ?????????????? ???  
?? ?????? ?????????? ??? ?????? ?????????? ?????? ?????????? ??? ?????? ??????????????  
????????? ?????? ?????????? ??? ?????? ?????????? ?????? ??????, ??? ?? ??????  
????????????? ??? ?????? ?????? ?????? ?????? ?????? ?????????? ?????? ??? ?????? ???, ??  
????????, ??? ?? ?? ?????? ?????? ?????? ??????, ??? ?? ?? ?? ??????????  
????????? ??? ?????????, ?? ?????? ?????? ??? ?? ?????? ?????? ?????????? ?????? ??? ??  
????????? ??? ?????? ?????????? ?????? ??????, ??? ?? ?????? ?????? ?????? ?????? ??? ??  
????????? ??? ?????? ?????????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??  
????????? ??? ?????? 14, ?????????? 2, ?????????? ??, ??? ?????? 2006/112, ???  
??????????.

(?????????)

\* ?????? ??????????: ? ???????.