German Advisory Group

Institute for Economic Research and Policy Consulting

Policy Briefing Series [PB/08/2011]

Tax Code of Ukraine - Shortcomings

Thomas Otten

Kyiv, June 2011

About the Institute for Economic Research and Policy Consulting

Institute for Economic Research and Policy Consulting (IER) is the leading Ukrainian analytical think tank focusing on economic research and policy advice. The IER was founded in October 1999 by top-ranking Ukrainian politicians and the German Advisory Group on Economic Reforms.

The mission of IER is to present an alternative point of view on key problems of social and economic development of Ukraine. In frame of the mission IER aims at providing top quality expertise in the field of economy and economic policy-making; acting as real leader of public opinion through organisation of open public dialog; contributing to the development of economic and political sciences as well as promoting development of Ukrainian research community.

Institute for Economic Research and Policy Consulting
Reytarska 8/5-A,
01034 Kyiv, Ukraine
Tel: +38 044 / 278 63 42
Fax: +38 044 / 278 63 36
institute@ier.kiev.ua
http://www.ier.kiev.ua

About the German Advisory Group

The German Advisory Group on Economic Reforms, which is active in Ukraine since 1994, advises the Ukrainian Government and other state authorities such as the National Bank of Ukraine on a wide range of economic policy issues and on financial sector development. Our analytical work is presented and discussed during regular meetings with high-level decision makers. The group is financed by the German Federal Ministry of Economics and Technology under the TRANSFORM programme and its successor.

German Advisory Group
c/o BE Berlin Economics GmbH
Schillerstr. 59
D-10627 Berlin
Tel: +49 30 / 20 61 34 64 0
Fax: +49 30 / 20 61 34 64 9
info@beratergruppe-ukraine.de
www.beratergruppe-ukraine.de

© 2011 German Advisory Group

© 2011 Institute for Economic Research and Policy Consulting

All rights reserved.

Tax Code of Ukraine - Shortcomings

#	Problem's description with reference to legal norms	Proposed solutions (amendments to the Tax Code or other legal acts)
	Value Added Tax (VAT)	
1	**VAT payer registration**	
1.1	• **Start-up company.** Art.183.1, 183.8 requirements: amount of taxable revenue has to be not less than 300k UAH (v/o VAT) during preceding 12 months (even not less than 360k UAH (incl. VAT) in practice!) in order to obtain VAT registration**. It's impossible to register a newly created company as VAT payer, which contradicts to international practice. Newly established companies cannot account input-VAT prior to VAT-registration, Input-VAT on import transactions before VAT-registration and input-VAT on all expenses for setting up the business is "lost", which contradicts to international practice and is moreover a significant barrier for projects which have a long start-up phase.** • **Reverse-charge VAT agents.** Company that receives services from non-resident with the place of supply on the custom territory of Ukraine according to art. 208, is obliged to accrue and pay agent VAT as a fiscal agent. If such Company, fiscal agent, is not registered as VAT payer, it has no right to reimburse such already paid to the budget VAT (no input VAT deduction allowed). Hence, **for companies-not VAT payers services from non-resident are 20% more expensive.**	➢ To allow VAT registration for newly created companies without min. 300k UAH of taxable revenue within last 12 calendar months and define exclusive list of reasons for rejection in VAT registration as well as foresee the accountability of tax authorities for unjustified rejections
1.2	• **Company after reorganization.** Art.183.17: a legal entity incorporated through the taxpayer's reorganization (except for transformation), should register as a VAT payer following the rules set for newly created company. Consequently, company with years of active business that went through reorganization should register as VAT payer once again, facing difficulties that are usual for newly created companies, meaning no VAT registration is allowed until the volume of taxable revenue for the preceding 12 months exceeds 300k UAH (360k UAH). This provision is a barrier to new businesses incorporation and general economic development of Ukraine.	➢ To cancel art.183.17
1.3	• **Registration of VAT invoices in General VAT Register.** Art. 201.10 foresee registration of issued VAT invoices in General VAT Register, in	➢ To foresee in art. 201.10 for the issued VAT invoices to be registered within 10 days from VAT invoice issue, while a

	case VAT in such invoices exceeds the set limit as per transitional provisions. TC does not specify the terms for such registration, while art. 201.4 states that VAT invoice is issued on the day when obligations arise and is handed to the buyer upon registration. In this case it is not clear whether the VAT invoice should be necessarily issued and registered only during the day when obligations arise. In practice it is not possible to conform to this requirement, due to VAT obligations arising from prepayments received might be reflected in the bank statement with delay, as well as operation volume might be considerable and one day will not be enough for all invoices registration.	customer has a right to deduct this input-VAT in the month of 1st event. In this case the moment of VAT invoice registration does not influence the right of customer for VAT deduction.
2	**Proportional allocation of VAT amounts to tax credit**	
2.1	**Input VAT allocation coefficient.** Art.199.1, 199.2 state that in case purchased or produced goods are partly used in taxable and non-taxable transactions, input VAT should be respectively allocated to deductible and not deductible. Coefficient for allocation of input tax amounts to deductible and not deductible in current year is to be calculated basing on the taxable/non-taxable revenue ratio of the preceding accounting year. Application of coefficient calculated on the basis of preceding year revenue is economically unacceptable since the ratio of taxable and non-taxable transactions performed in preceding and current years can vary significantly. As it can happen that VAT payer will not be allowed to deduct the appropriate amount of input VAT due to taxable transactions increase in comparison to preceding year, VAT payments to the budget will be overestimated	➢ To cancel the articles about VAT allocation coefficient calculation basing on preceding year taxable and non-taxable transactions volume. Input VAT of current year should be calculated basing on the current years activity.
2.2	**VAT adjustment for fixed assets every 12, 24, 36 months.** Art. 199.4 sets special requirements for input VAT distribution at fixed assets purchase basing on the previous year's coefficient, as above, with following recalculation of input VAT deductible basing on the coefficient that is to be calculated every 12, 24, 36 months for each fixed asset put into operation. Leads to unreasonable time spent for tax calculation.	➢ To consider the accounting workload concerned with such recalculation, especially considering that VAT adjustment is to be conducted by each VAT invoice received from suppliers. Recalculation might be done only once per year for all fixed assets together with end year closing upon VAT-payers discretion.
3	**Custom, regular and market value of imported goods.**	

	• According to art. 39.13 **usual price for supply on the custom territory of Ukraine is a market price, but it cannot be lower than custom value**. Art.188.1 defines the basis for VAT assessment as contract value of goods/services that cannot be lower than usual price. In case of imported goods are sold with the prices below custom value, the basis for VAT obligation assessment has to be not less than custom value (custom value - the value from which VAT was calculated and paid at custom clearance. It is indicated by the custom authorities and can exceed the price stipulated in supplier invoice). There are several issues that are concerned with these articles application: 1. Customs clearance procedure presumes that customs declaration contains the customs value of the group of goods covered by the same classification code. Several goods can be included in the same group in one customs declaration, without any possibility to calculate the custom value for each individual item. Therefore, it is not clear what goods value should serve as the basis for verification and comparison of price for individual good with the custom value, in case **where it is impossible to calculate the customs value for each individual good**? 2. **Custom value of goods is indicated for the measurement unit which does not correspond to the measurement unit used at goods sale** (e.g. the custom value is indicated for kilograms, and the retail selling price is indicated for a roll). Therefore, how the good's custom value can be compared to its selling price if such goods measurement was conducted in different unmatchable units for custom clearance and for trade?	➢ To harmonize custom procedures and documents with tax code requirements to make it easy to identify custom value of each item of imported goods.
4	**Reverse-charge VAT for services from article 186.3 (c)**	
	• **Since place of supply for services,** indicated in point (c) of art.186.3 is clearly defined. Particularly, this definition leads to the question for taxation of such services received from non-resident. According to art. 196.1.14 services from art. 186.3 point (c) are not objects for VAT taxation at all. At the same time for services listed in point (c) if received from non-resident, the place of supply is the custom territory of Ukrainian, while art. 208 does not contain any exceptions on types of services in connection with which residents have the possibility not to account agent VAT. Not clear what article takes precedence.	Draft law canceling VAT exemption for consulting, accounting, engineering, legal services was accepted by the parliament and is currently sent to the President for signing (Draft law 8321 from 31.03.2011) would solve this problem. If not signed by president, we suggest to declare 196.1.14 as dominant article.

5	**Other issues**	
	• **Commission transactions.** By application of full scope of general taxation rules (both for commissions and for amounts obtained for execution of instructions according art. 189.4 TC), those service provider are facing serious liquidity problems, if their customers do not pay on time. • Place of supply for **freight forwarding services** is the place of customer registration (paragraph 186.3), but paragraph 186.2 states that for passengers and goods transportation the place of supply is the place where such services are actually rendered. I.e., there is a discrepancy between these paragraphs. • According to paragraph 195.1.3 of TC, 0 % rate is applied to full freight rate for international deliveries in case such are confirmed by international transport document. Though TC does not contain the definition of the term "international transport document". • **VAT exemption.** Acc. to transitional clause sale and export/import of grain crops, timber and ferrous/non-ferrous materials scrap is VAT exempt till 2014, except for first delivery by producers. For traders it will mean that the goods are purchased with VAT, though it cannot be deducted due to absence of taxable revenue, so such VAT will increase the goods cost. It will have negative impact on producers, as it might lead to 20% decrease in purchasing prices, while producers of grain crops will have to sell their goods to release silos and obtain money for new harvest	➢ To restore the old taxation rules for agent (commission) operations (from art.4.7 of VAT Law) ➢ To eliminate the existing discrepancy stating that place of transport services supply is the place where such services are actually rendered ➢ To define CMR as an "international transport document" ➢ To regulate the trading market in order to avoid negative impact on producers (for example, to cancel VAT exemption)
	Corporate Profit Tax (CPT)	
6	**CPT cost of goods**	
6.1	• According to par. 11 of Accounting standard 16 "Expenses" **manufacturing costs** include **direct and indirect general production expenses that are expensed upon income receipt**. Art. 138.8 of TC presumes for indirect cost to be expensed in the period when these costs are incurred. This leads to inconsistencies between commercial and tax accounting, requiring double accounting work. • Ukrainian GAAP of financial accounting has been changed and now allows as alternative to previous bullet point a correspondence to tax code principles of cost of goods accounting, while the method fixed in the TC	➢ To correct art.138.8 about manufacturing cost of goods with purpose to minimize difference between financial and tax cost of goods accounting. Due to cost of sales format applied for taxation as well, this would even increase taxable base, because cost of produced but not sold goods do not reduce taxable base. ➢ To foresee that general manufacturing expenses can be included into cost of goods according to production process peculiarities that have to be written (fixed) in the accounting

	is not economically sound and contradicts to IFRS principles.	policy order of the tax-payer That should correspond to Accounting standard 16 “Expenses” ➢ To cancel changes into Accounting standard 16 “Expenses” that allow to use tax cost determination method as such, that it is not economically sound.
6.2	**Expenses connected with purchase of goods (services) from private entrepreneurs**, who are on a simplified tax system, cannot be included into expenses in CPT accounting (art.139.1.12), except of IT services.	➢ This is a good way to stop black schemes of doing business in Ukraine, IT-services should have the same rules in the future. ➢ The draft Law 8521 from 16.05.2011 was registered and could be taken as a background for the TC chapter about simplified system in the first stage of simplified taxation system changing, but we would not recommend to again accept expenses of simplified tax payers again as tax deductible since this would very likely bring back the usual money laundering schemes.
7	**Rates of spoilage expenditures**	
	According to art.140.1.4 par. 4 Cabinet of Ministers of Ukraine (CMU) should issue a special regulation about the procedure of warranty repairs or warranty replacements and the list of goods that are a subject to the guarantee services. This article also foresees that any expenses on the repair warranty (maintenance) or warranty replacement of goods sold by the taxpayer, whose value is not compensated at the expense of customers of such goods, should be taken into account in the amount that corresponds to the level of guarantee replacements adopted (disclosed) by the taxpayer, though it is still not clear whether warranty expenses can be tax deducted at all till CMU issues the abovementioned regulation. Additionally, art. 140.1.4 can limit expenses deductibility foreseen by art.138.10.3 “e”.	➢ To add a paragraph to art.140.1.4 that will stipulate that the taxpayer can determine warranty norms in an internal order based on technical documentation (or historical data) that will be in effect until CMU issues its regulation (e.g. similar phrase as in art. 138.7 par.2).
8	**CPT expenses restrictions**	
8.1	• **Consulting, marketing, advertising services from non-resident** – 4% of previous year sales w/o VAT (art.139.1.13), • 0% for consulting, marketing, advertising services from offshore companies	➢ To exclude limitation for non-residents (except offshore zones) ➢ To add Cyprus into the list of offshore zones (this proposal is actual for current point and points 8.2-8.3 of this list as well)

8.2	• **Engineering services from non-resident** while importing equipment– 5% from custom value of imported equipment (art.139.1.14), • 0% for engineering services from offshore company or from non-beneficiary (actual) recipient.	➢ To exclude limitation for non-residents (except offshore zones)
8.3	• **Royalty to non-residents** – 4% of previous year sales w/o VAT (art.140.1.2), • 0% from royalty to offshore companies or to non- beneficiary (actual) recipient • 0% from royalty to resident – not usual rate CPT payer	➢ To exclude limitation for non-residents (except offshore zones) ➢ To specify precisely the definition of beneficiary (actual) recipient in Tax Code (see special consultation)
8.4	**Fixed assets repair**/improvement expenses – 10% of all fixed assets tax value at the year beginning is allowed to be included into current period tax expense (art.146.12) – to clarify year beginning for quarters 2-4 of 2011.	➢ To add into chapter XX an article that for 2011 (quarters 2-4) the balance value of fixed assets on 01.01.2011 is applied for calculation of 10% repair limit deducted on amount used in quarter 1 of 2011
9	**Non-residents income taxation**	
	20% withdrawal tax must be paid **at cost of tax payer-resident** while paying for **advertising services provided by non-resident. Double taxation agreements can't be applied in such case.** This will decrease the volume of advertising abroad (20% more expensive) as well as volume of export sales as a result.	➢ To apply standard taxation rule for non-resident incomes (15% of income, if other is not foreseen by double taxation agreement) for advertising services provided by non-resident.
	Tax Administration	
10	**Responsibility of taxpayers for violations committed before the Tax Code entered into force**	
	What fine rates should be applied for violations before 1.1.2011? Whether the penalty will be charged? Based on fact that Law 2181 lost its power since 01.01.2011, fines for the period before Tax Code should be defined in TC. In order to avoid applying higher fines (50% or 75%) instead of 25% for the first time violation not taking into account mistakes revealed in tax audits provided before 01.01.2011 it should be fixed that old periods have no influence on fines' size applied after 01.01.2011.	➢ To define how to apply fines for tax violations for the period before 01.01.2011 in Tax Code (draft law 8217 from 12.3.2011 contains a sufficient solution). ➢ To add an article that fines applied from 01.01.2011 do not take into consideration violations revealed in tax audits before 01.01.2011 and fines applied before 01.01.2011

11	**Responsibility since 2011 and tax reports submitting**	
11.1	Actually **different articles of chapter II can be applied for the same violations**, e.g. primary document absence (defined as a separate violation according to art.121 that foresees special fine) leads in any case to expenses reduction and CPT increase because of absence of primary documents (fines applied according to art.123) and to rules of tax calculation violation (additional separate fine foreseen by art.126). How will violations of the same type be considered – if several primary documents are not available? Will the fine for each of them be applied?	➢ In order to avoid double fining for same violation, to exclude art.121, because art. 123 is sufficient for fines application.
11.2	Art.123 foresees **fines from the amounts of overstated CPT loss or negative VAT balance**. So, the base for a fine is overstated negative tax result but not potentially unpaid or underestimated tax.	➢ Fine for negative result overestimation in art. 123 should be analogous to the unpaid taxes, i.e. base for fine calculation should be not overstated loss but only overstated loss multiplied by tax rate of respective period.
11.3	Art.111.2 and 113.3 of TC declare that **financial responsibility for tax legislation violations is defined by Tax code or other tax legislations**. There are some fields of activity which are regulated with subordinate regulatory acts, e.g. President Decrees etc. So, for some violations financial responsibility of taxpayers is not foreseen since 2011 (e.g. cash settlements rules violations, which are regulated by President Decree dated 1995.06.12)	➢ To adjust legislation and subordinate regulatory acts in force to avoid contradictions with tax code.
11.4	**Right of tax authorities to demand documents** of tax payers during different types of tax audit is foreseen in art.20.1, but its subparagraphs contain a lot of contradictions (e.g. primary documents or all documents must be provided) or doubled information (20.1.2 and 20.1.7).	➢ To cut number of subparagraphs which define the right of tax authorities to demand documents of tax payers, to stipulate their power (rights) more precisely.
11.5	**Responsibility of tax payer for damage or destruction of primary documents** and action steps which should be taken in such case are declared in articles 44.5 and 139.1.9 of TC, which contradict each other.	➢ To define more precisely responsibility of tax payer for damage or destruction of primary documents and action steps which should be taken.
11.6	**The procedure of appeal against actions or inaction of tax authorities** is not defined, but it is possible according to TC (art.49.13-49.14). There is an obligation of tax authority, which is fixed in art.49.8-49.9, to accept tax declarations. But in practice there is no way to submit declaration to a tax authority if a tax inspector rejects to accept a	➢ To define the procedure of how a tax payer can appeal against actions or inaction of tax authorities. ➢ To add an article that in case if tax inspector illegally rejects tax declaration submission tax payer has a right to submit a hard copy of declaration via registered mail without

	tax declaration. According to art. 49.9 a tax declaration is regarded as submitted in one of following cases: 1) All pages of tax declaration were marked (stamped) by the tax authority 2) Certificate of electronic reporting system was received from the tax authority 3) Registered mail notification was signed by the tax authority If tax authority does not send a notification within 3-5 days depending on the way of submitting the tax declaration is counted as accepted.	conforming to a 10-day rule without fines being applied ➢ **Better solution** – as e.g. German practice – to cancel the need of acceptance and shift to electronic submission on time (see 2.8). In case if on time submitted declaration contains mistakes in the opinion of tax inspection, tax inspection has got the right to carry out a tax audit. In case of no submission, the tax inspection can apply penalties for not submitting and apply fines for late tax payments as foreseen in TC, in case of no submission at all within a defined period, the tax inspections has got the right to estimate tax obligation, whereas estimation methods need to be defined by Ministry of Finance according to "High performer" of respective economic activities. ➢ **Since not all companies would like electronic submission, it should be by application allowed for small companies to submit hard copy declarations by registered mail 10 days prior to due date of submission.**
11.7	**Electronic reporting submission** Despite general State policy to make reporting procedure easier, tax authorities act in a completely different way: make difficulties with electronic reporting agreement signing, use all ways to reject submitting if declaration contains negative result of a taxable base or VAT credit reimbursement or tax payer wants to submit corrected report for previous periods or legal address changing (mass registration address, which even includes usual business centers, where by nature many companies are registered), etc TC (art. 49.4) obliges some legal entities to submit tax declarations in electronic way, but in practice sometimes it is impossible because of problems with tax authorities described above.	➢ To re-organize all procedure of electronic reporting, i.e. • Special State authority, which will (for example) be under control of Ministry of Finance, should be established in order to avoid influence of tax authority on reporting submission • Electronic reporting agreement signing can be signed by the State registrator at the moment of legal entity registration (for already registered – by the request) • This special authority will be responsible for technical side of tax declaration submission and providing these data to the tax authority on a daily base • Such State authority can provide services and electronic reporting system on a chargeable base in order to cover their expenses. Nowadays commercial structures are responsible for providing this kind of services • To simplify the procedure of agreement signing, electronic keys generating, reports submission
11.8	• Art. 138.2 par. 1 fixes that tax expenses have to be supported by primary documents. The article refers to the general accounting principles that are stipulated in art. 9 of the Law "About Accounting in Ukraine". • The problem is, that according to the TC some documents, e.g. payment	➢ To include into art. 138.2, par.1 a phrase "and as well payment documents (for settlements with bank only), agreements, accounting notes, internal orders or other documents as long as they can prove link to business activity

	documents (such as bank statements), invoices and accounting notes, do not correspond to the definition of a primary document, because they do not have all details foreseen by art.9 of the Law "About Accounting in Ukraine" and following this they might be not accepted as primary documents. • Art. 138.2 par. 2 of the foresee possibility to count expenses as a tax deductible connected with long-term goods producing partially into current tax period that correspond to reflected tax income, but it is not defined how to prove such expenses and which primary document have to be provided to a tax authority. The same situation is with other expenses in art.138 (interest, taxes calculated, cost of goods calculated, damages, reserves, insurance, etc.)	
12	**Terminology definition**	
12.1	There are no clear definitions of following terms, a lot of similarities, so it's difficult to identify the type of operation that can lead to risks in tax accounting: ➢ **Intangible assets (art.14.1.120)** ➢ **Royalties (art.14.1.225)** ➢ **Sales of services (art.14.1.185)** There are no definitions of following terms, which can lead to risks with such types of income/expenses defining for taxation: ➢ **Advertisement (art.140.1.5)** ➢ **General corporate expenses (p. "a" of art. 138.10.2)** ➢ **Presales goods preparation (p. "g" of art. 138.10.3)** ➢ **Representative expenses (p. "a" of art. 138.10.2)**	➢ Meaning should be defined or/and clarified more precisely ➢ To add definitions of mentioned terms into art.14 of the TC ➢ Required supporting documents have to be stipulated in the TC, e.g. for representative expenses confirmation protocol (memorandum) on the meeting (event) should be provided
12.2	• **Beneficiary (actual) recipient** (art.139, 140, 103.3) has no definition	Proposal and description of German legislation concerning this case was already provided in Policy Briefing PB/06/2011
12.3	**Consulting, engineering, marketing, advertising, IT, intermediary services** – definition in art. 186 is not clear	➢ Referring art.186 of TC to KVED-codes (codes of economic activity) of described (mentioned in the list)

List of recent Policy Briefings

- Proposals for reforming the SME definition in Ukraine, by Oleksandra Betliy, Oksana Kuziakiv, Ricardo Giucci, Alexander Knuth, Policy Briefing 7, June 2011
- Shortcomings in the Tax Code regarding “Beneficial Owner”, by Thomas Otten, Policy Briefing 6, May 2011
- Economic cost of cheap Russian gas. Analysis and Policy Recommendations, by Ricardo Giucci, Georg Zachmann, Policy Briefing 5, April 2011
- EU Energy Strategy and its Implications for Ukraine, by Georg Zachmann, Policy Briefing 4, April 2011
- Außenwirtschaftsförderung in Deutschland: Die Rolle der Auslandsvertretungen, by Ricardo Giucci, Robert Kirchner, Policy Briefing 3, April 2011
- Start-up Centers in Ukraine: A Roadmap, by Ricardo Giucci, Alexander Knuth, Policy Briefing 2, March 2011
- Überblick über die deutsche Außenwirtschaftsförderung, by Ricardo Giucci, Robert Kirchner, Policy Briefing 1, February 2011
- Comments on the draft document of the Ministry of Finance of Ukraine "On the approval of methodological recommendations on application of bookkeeping registers by small enterprises", by Nataliya Shevchenko, Polina Koshlak, Oleksandra Betliy, Thomas Otten, Policy Briefing 11, December 2010
- FDI Promotion in Ukraine: Arguments for an independent national FDI promotion agency, by Alexander Knuth, Policy Briefing 10, November 2010
- The influence of creditors' protection on credit markets, by Ricardo Giucci, Robert Kirchner, Policy Briefing 09, November 2010
- SME policy: Instruments and challenges, by Ricardo Giucci, Alexander Knuth, Policy Briefing 08, November 2010
- Financing instruments in the traffic sector in Germany and recommendations for Ukraine, by Frank Meissner, Oleksandra Betliy, Policy Briefing 07, November 2010
- Taxation of Individual Entrepreneurs in Germany: Follow Up, by Alexander Knuth and Ricardo Giucci, Policy Briefing 06, October 2010
- Comments on Depreciation Methods foreseen for Profit Taxation in the Draft Tax Code (Draft Tax Code version as published on Aug 3, 2010), by Thomas Otten, Ricardo Giucci and Robert Kirchner, Policy Briefing 05, August 2010
- Selected Comments on the Draft Tax Code (as adopted in the first reading on June 17, 2010), by Ricardo Giucci, Robert Kirchner, Oleksandra Betliy and Thomas Otten, Policy Briefing 04, July 2010
- Taxation of Individual Entrepreneurs in Germany, by Alexander Knuth and Ricardo Giucci, Policy Briefing 03, July 2010
- The VAT refund problem: Towards a sustainable solution for the future, by Ricardo Giucci and Robert Kirchner, Policy Briefing 02, July 2010
- Reforming the Simplified Taxation for Individual Entrepreneurs in Ukraine, by Ricardo Giucci, Robert Kirchner, Oleksandra Betliy and Thomas Otten, Policy Briefing 01, June 2010

All papers can be downloaded free of charge under http://beratergruppe-ukraine.de/?content=publikationen/beraterpapiere. For more information on subscription to our regular email-distribution, please contact info@beratergruppe-ukraine.de