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THE COMMERCIAL BANK'S CONTRIBUTION TO THE OPTIMIZATION OF FISCAL MANAGEMENT

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Abstract. The purpose of this article is to examine how commercial banks contribute to improving the quality of tax administration, highlighting the essential role these institutions play in the correct collection and reporting of taxes. The author also aims to highlight how banks facilitate the payment of taxes and tax contributions, thus contributing to the simplification of the payment process for both taxpayers and tax authorities. Finally, the purpose of the article is to emphasize the importance of commercial banks in ensuring equity and transparency in the tax system, with an impact on the sustainable economic development of a country. The methodology used in this research refers to the review and conceptual analysis of concepts and practices related to how commercial banks influence tax administration. In conclusion, the commercial bank is an essential piece in the tax administration puzzle. The role of these institutions is not only to ensure the payment of tax obligations, but also to correct and optimize the activity of the tax system.

Keywords: commercial bank, tax administration, taxpayers, services, government payments, tax liabilities

JEL Classification: G21, H21, H26, E42

Introduction.

The Republic of Moldova faces various long-term challenges and trends at the national, regional and global levels, which will have a significant impact in the coming decades. The degree of uncertainty and unpredictability increases, which requires the adoption of new development paradigms that take into account limited resources and internal capacities. Rapid technological progress fundamentally changes the dynamics of society, opening up new opportunities for development, but technology often evolves faster than society's ability to adapt to it, generating significant long-term challenges. Despite these challenges, there are also numerous opportunities that can and should be exploited.

The financial system is one of the fundamental pillars of any national economy around the world. The three key elements of the financial system are represented by banks, insurance and investment funds. Obviously, the banking sector occupies the central position in the structure of the financial system.

The process of collaboration between commercial banks and state institutions.

A nation's progress derives from the collaboration between commercial banks, government institutions, investors and market players. A country's development is hindered as long as the rules and laws in force are not respected. Therefore, the main participants must work together to improve and promote the financial environment of the country. The National Bank of Moldova has the role of coordinating the activity of commercial banks in the Republic of Moldova. Its main duties are to regulate and supervise banks to ensure that they operate safely, complying with the requirements of prudent and sound management. In order to maintain financial stability and strengthen the banking

system, as well as to prevent banks from engaging in high-risk operations, the National Bank of Moldova (NBM) conducts an active policy regarding the regulation and supervision of the banking sector. These measures must also guarantee the protection of the interests of depositors, but also of other creditors, as well as the proper functioning of the banking system, as well as their effective interaction with other state institutions. The commercial banks of the Republic of Moldova are closely connected with the key institutions of the state in order to fulfill the objectives set by both parties involved.

In the modern market economy, the activity of commercial banks has an important role, due to their connections with all areas of the economy. Commercial banks are a fundamental element in the global economy, playing a crucial role in the development and management of financial resources. In addition to their traditional functions of financial intermediation and provision of banking services, these institutions have a significant impact on the fiscal administration of a state. Banks aim to ensure the constant flow of capital and cash, to provide loans to industrial enterprises, the state and citizens, as well as to create favorable conditions for economic development.

One of the state institutions with which commercial banks interact directly is the State Fiscal Service. The State Fiscal Service is the public authority, empowered to administer taxes, fees and other payments in the interest of the state. The mission of the State Fiscal Service is to facilitate an efficient process of tax administration and service by creating favorable conditions for taxpayers to comply with the tax law, the uniform application of tax policy and regulations, and providing the necessary resources to the state to finance social projects and promote development society as a whole. Thus it collaborates with public authorities and institutions or any other entities with law enforcement powers or interested in implementing the provisions of fiscal legislation in the part related to fiscal administration. [5]

According to the current fiscal regulations, there are several areas in which the State Fiscal Service collaborates with financial institutions. One of the most important contributions of commercial banks to tax administration is the correct collection and reporting of taxes. Banks are required to keep records of their customers' financial transactions, including deposits, withdrawals, transfers and business transactions. This detailed information is essential for establishing taxpayers' income and assets, allowing tax authorities to calculate taxes correctly. Moreover, banks have an obligation to report suspicious or unusual financial transactions, which helps prevent tax evasion and money laundering.

A first aspect refers to the procedure for opening bank accounts for taxpayers, especially for economic agents, which according to art. 167 of the Fiscal Code, consists in the fact that the bank opens bank accounts and/or payment accounts for natural and legal persons, while the National Bank opens bank accounts and/or payment accounts in accordance with the Law on the National Bank of Moldova, only if they present a tax code assignment certificate or an equivalent document. Regarding the opening of these types of accounts (with the exception of transitory accounts intended for the execution of budgets, credit and loan accounts, term deposit accounts and temporary accounts for the accumulation of social capital), commercial banks are obliged to notify the Fiscal Service on the same day of the State through an automated information system for the management and transmission of electronic documents between the State Fiscal Service and financial institutions and/or payment companies.

Transactions made on a bank account and/or payment account opened (with the exception of temporary accounts intended for the execution of budgets, credit and loan accounts, time deposit accounts and temporary accounts for the accumulation of social capital, as well as accounts of natural persons who do not carry out entrepreneurial activities) can be initiated only after the commercial banks have received the electronic document issued and transmitted by the State Fiscal Service, which confirms the fiscal registration of the account.

The bank account and/or payment account is registered by the State Fiscal Service on the basis of an electronic document issued and transmitted by commercial banks to confirm the opening of the account. In the situation where the taxpayer has unpaid debts, the State Fiscal Service has the right not to issue the electronic document confirming the tax registration. The electronic document certifying the opening of the account and the electronic document confirming the fiscal registration of the account must be transmitted and received through the automated information system for the creation and transmission of electronic documents between the State Fiscal Service, financial institutions and/or payment companies and commercial banks.

Initially, this exchange of information between the State Fiscal Service and commercial banks in the Republic of Moldova was provided on paper, and the procedure could last a day or more, which prevented the taxpayer from using the account immediately after registration with the financial institution, the electronic exchange of information being released only in 2012. [1]

A significant moment in the process of collaboration between the State Fiscal Service and commercial banks was the implementation of the Circulation of electronic documents. This system is a component of electronic government based on modern information and communication technologies, and allows the creation, processing, digital signature, storage and transmission (circulation) of electronic documents between the State Fiscal Service and the financial institutions of the Republic of Moldova.

The system covers several functionalities such as:

- opening, modifying, closing or fiscal registration of bank accounts;
- issuing and managing provisions regarding the suspension of transactions on bank accounts;
- issuing and managing collection orders (incaso);
- accessing information on transactions on bank accounts (balance and turnover of financial means on bank accounts).

According to tax legislation, financial institutions draw up and submit the following documents to the tax authority:

- the certificate regarding the opening of bank accounts - when opening bank accounts for interested persons, the financial institution is obliged to inform the tax body on the same day;
- the certificate regarding the modification or closure of the account - the financial institutions will inform the fiscal body on the same day about the modification or closure of the bank account;
- the spine of the suspension provision - the suspension provision is issued in case of committing some violations. In this sense, a document is issued which is completed both by the fiscal body and by the financial institution, being, subsequently, kept in the file of the taxpayer.
- information regarding the full or partial execution of the collection order - if the taxpayer has funds in his bank account, the financial institution is obliged to execute, within the limits of these funds, the collection order of the fiscal body;
- the information notice regarding the balance available in the bank accounts - in the event that the taxpayer does not have funds in his bank account to settle, in whole or in part, the tax obligation, the

financial institution remits the collection order to the tax body, on the day of receipt, making the mention on it about the total or partial lack of means;

- the information regarding the circulation of funds, the balance on the bank accounts, the transactions and operations carried out - the respective document will be authenticated by the signature of the head of the financial institution, and the information will be presented to the tax authority for each separate bank account.

In turn, according to the procedures established by law, the State Fiscal Service draws up and sends the following documents to the address of the financial institution:

- the certificate regarding the recording of bank accounts - the document contains information regarding the acceptance of the State Fiscal Service to record the taxpayer's bank account. The document is confirmed by signature;

- refusal to register the bank account for tax purposes - for certain internal reasons, the State Fiscal Service may limit the taxpayer's right to use new bank accounts. Respectively, the fiscal body expresses its refusal to confirm receipt of the new bank account in its records;

- the provision regarding the suspension of operations on the taxpayer's bank accounts - the fiscal body can remit both the financial institution in which the taxpayer has bank accounts, and the provision regarding the suspension of operations on his bank accounts;

- collection order on the taxpayer's bank accounts - starting with the day following the day in which the arrears appeared or in which it was learned about its appearance, the fiscal body is entitled to submit collection orders, which have the value of executive documents;

- the communication about the cancellation of the provision regarding the suspension of operations on the taxpayer's bank accounts - this provision is canceled once the violation for which the suspension was applied is liquidated;

- bank subpoena - by means of the bank subpoena, the person is invited to the tax body to submit documents or present other types of information, relevant for the determination of the tax liability State Fiscal Service. [1]

These documents, whether they are generated by financial institutions and sent to the State Fiscal Service or vice versa, are created in electronic format and are transmitted through the automated document circulation information system. In accordance with Art. 167 and art. 197 of the Fiscal Code, the Main State Fiscal Inspectorate issued Order no. 284 of 19.04.2012, according to which "electronic documents confirming the opening, modification, closing or fiscal registration of bank accounts, suspension of transactions on bank accounts, as well as information on the balance and circulation of financial means on bank accounts, will be transmitted and received mandatory through the SIA CCDE between the State Fiscal Service and financial institutions. As the technical administrator of the information system of the State Fiscal Service, ÎS "Fiscservinform" has the responsibility to administer, maintain, develop and maintain the operation of the SIA CCDE.

The document circulation system between the fiscal body and financial institutions brings numerous advantages, improving the quality, speed and transparency of the process of optimizing the administration and management of fiscal obligations, based on the principle of equity. Among the obvious benefits are:

- safe and centralized storage of documents, eliminating the need for additional costs for transport and courier, as well as saving materials such as paper and office supplies;
- the use of modern IT systems allows for a significant reduction in the response time between submitting the taxpayer's request and receiving a response, facilitating the administrative process;

- the implementation of this system leads to a streamlining of the internal stages required in a specific procedure, which allows the reduction of the number of officials assigned to execute the activities of the process, freeing human resources for other tasks.

Another aspect of the collaboration between the State Tax Service and commercial banks is related to tax management in terms of taxpayer compliance. This involves procedures for the forcible collection of assets from the accounts of defaulting taxpayers, as well as other tax administration measures such as collection or provision of cash flow information.

The suspension of operations on bank accounts is an action carried out by the authorities with powers defined by law and has the objective of restricting the rights of taxpayers and other persons to whom the suspension procedure is applied, in terms of the use of available funds or those to be deposited in bank accounts, with the exception of those intended for credit and temporary accounts for the accumulation of social capital, as well as accounts of natural persons who are not involved in commercial activities.

The authorities empowered by law to suspend operations on bank accounts issue suspension documents (in the form of provisions, ordinances, etc.) which they transmit to banks through the electronic exchange of information, in banks where taxpayers and other persons who may be affected by suspension procedure have open accounts.

When receiving a stay of execution document, banks are required to:

- register the suspension document in accordance with the bank's internal procedures;
- stop the operations in the bank accounts according to the provisions of the suspension document, with the exception of the operations that are allowed in accordance with the legislation in force;
- provide information to the issuing body of the suspension document regarding the availability of funds in the accounts, when this information was requested;
- the seizure of funds from bank accounts is carried out by the authorities authorized by law, in order to ensure the execution of executive documents;
- mark on a copy of the enforceable document the date and time at which it was received for enforcement.

If the balance of the bank account is not sufficient to cover the amount specified in the enforcement document, the bank will apply the seizure to the extent of the available means and will inform the body issuing the enforcement document about the amount for which the seizure was applied. As the funds accumulate in the account, the bank has the obligation to attach them until the full amount indicated in the enforcement document is secured.

The indisputable collection of funds from the bank accounts of the taxpayer/debtor is carried out by the bank based on the collection order issued by the person authorized by law with this right. The collection order is issued in the state language and is forwarded both to the account opened in Moldovan lei and to the account opened in foreign currency, depending on the account and currency indicated in the collection order. [6]

Commercial banks in the Republic of Moldova carry out monthly withholdings and financial transfers in favor of the Population Support Fund. This fund was created with the aim of financing programs with a special purpose in the field of social assistance, supporting social services included in the minimum package of social services in accordance with Government regulations, as well as financing

other social assistance measures established by the Ministry of Labor and Social Protection. Also, the fund supports the remuneration or increments for staff working in the field of social assistance and involved in social projects financed from external sources, within the limits of the allocations provided in the agreements or memoranda of understanding signed between the Ministry of Labor and Social Protection and the development partners. The fund also provides financing for social aid canteens.

One of the extended ways in which the Population Support Fund is financed consists of transfers obtained through mandatory additional payments, which represent 0.1 percent of the total amount paid by individuals for the purchase of foreign currency in cash and traveller's checks in foreign currency in exchange for cash. These transactions take place at foreign exchange offices and licensed banking institutions that carry out cash foreign exchange activities with individuals, including through currency exchange devices.

Banking institutions/currency exchange points are obliged to provide monthly, by the 25th of the month following the managed period, reports on payments to the Population Support Fund in the form specified by the State Fiscal Service. This reporting of payments to said fund must be done using automated electronic reporting methods as a priority.

Commercial banks/exchange points are obliged to transfer the accumulated amounts monthly, until the 25th of the immediately following month, to the treasury accounts of the second-level local budgets, depending on the location of the locality, according to the payment method through the treasury system of the Ministry of Finance. [4]

Commercial banks in the Republic of Moldova and government institutions, especially the State Fiscal Service, constantly maintain a close collaboration, which means that commercial banks contribute to the withholding of tax due from interest paid to individuals.

According to the Law on the modification of some normative acts no. 257 of December 16, 2020, which entered into force as of January 1, 2021, an amendment was made to Article 90 (1) of Fiscal Code no. 1163/1997. According to the provisions of this law, interest paid to resident natural persons, calculated as of January 1, 2021, is subject to taxation.

Following this change, banks, savings and loan associations, and issuers of corporate securities initially applied a 3% tax rate on interest paid to resident individuals. However, according to the Law on the modification of some normative acts no. 356 of December 29, 2022, amendments were made to article 901 paragraphs (37) and (38) of the Fiscal Code of the Republic of Moldova. Thus, banks now withhold a tax of 7% from the interest paid to resident natural persons for the balances of deposit accounts, current accounts and card accounts. In addition, banks acting as primary dealers apply a tax rate of 12% on income in the form of interest and/or capital growth obtained by natural persons from government securities issued by the Ministry of Finance of the Republic of Moldova.

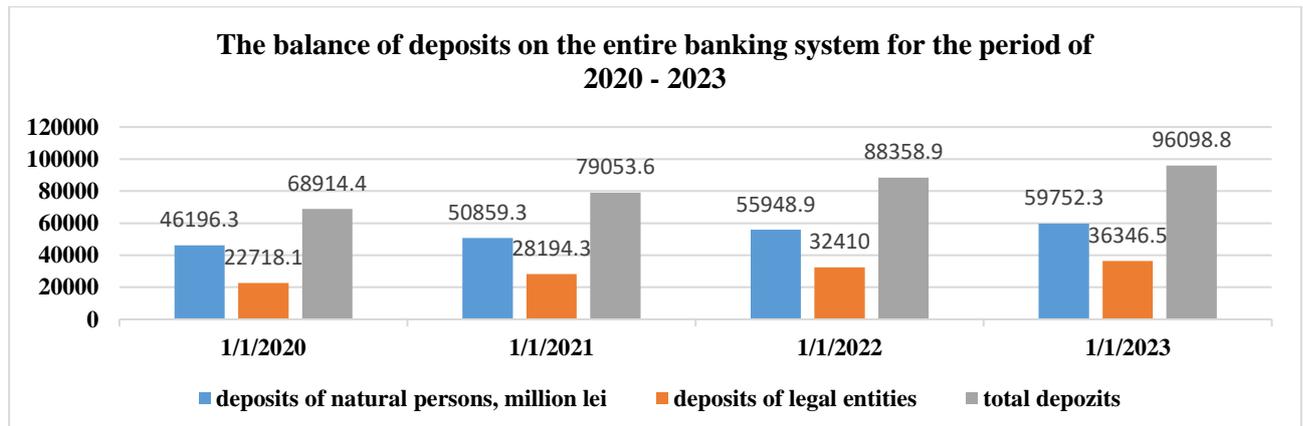


Figure 1. The balance of deposits throughout the banking system for the period January 2020 - January 2023, million lei

Source: Prepared by the author based on the "NBM Report: Structure of deposits in the banking sector" <https://www.bnm.md/bdi/pages/reports/drsb/DRSB10.xhtml> (cited 16.10.2023)

If we evaluate the impact of the introduction of the tax on the interest paid to individuals, we can see that the total balance of deposits in the entire banking sector registers a positive trend, in the sense of increasing the level of deposits in the bank, which attests to the fact that the level of taxation and the increase of the tax rate from 3% at 7%, it did not negatively influence the decisions of the population, which reflects the increased confidence of individuals in the banking system or more attractive interest rates. (figure 1).

In the Republic of Moldova, the state securities market was established in 1995. Since then, the Ministry of Finance, which issues state securities, in collaboration with the National Bank of Moldova as a state agent, has implemented a series of measures to develop a modern financial market:

- a) organized the primary market of state securities based on the principles of transparency and fair competition between participants;
- b) they created a system of primary dealers with the aim of ensuring the subscriptions of state securities and developed the secondary market of these securities;
- c) have guaranteed the safe and secure registration of ownership of state securities within the system managed by the Central Single Depository of Securities.

The state securities market (SSM) in the Republic of Moldova operates through commercial banks that have the capacity of primary dealers. These banks have concluded agreements with the National Bank of Moldova to perform the functions of primary dealer on the state securities market.

Primary dealers have the opportunity to participate in the SS placement auctions in their own name and on their own account, but also on behalf of their customers at their request. Customers of primary dealers can be both natural and legal persons, resident or non-resident.

The National Bank of Moldova, in accordance with the criteria established for the selection of banks as primary dealers and according to the assessment of their activity, decides on the list of primary dealers. The NBM also conducts quarterly analyzes of the activity of primary dealers and may suspend the agreement on the performance of primary dealer functions in case of non-compliance with the criteria.

If we analyze the volume of VMS realized, we also observe a positive dynamic (figure 2.). According to Figure 2, we can see that all types of State Securities (SSM) auctioned have seen significant increases in sales volumes, which is largely due to the attractive interest rates offered.

The evolution of the state securities market in 2023 was influenced by the high level of the inflation rate in 2022 and the measures adopted by the National Bank of Moldova (NBM) in order to combat inflation. During the year, the NBM increased the base rate from 8.50% to 21.50% and increased the reserve requirement in the national currency, the Moldovan leu (MDL), from 28% to 40%. In this context, interest rates for VMS with a maturity of 1 year increased from 9.88% to 21.85% in November 2022. However, starting in December, the NBM adopted an opposite approach by reducing the base rate and the reserve requirement mandatory in MDL.

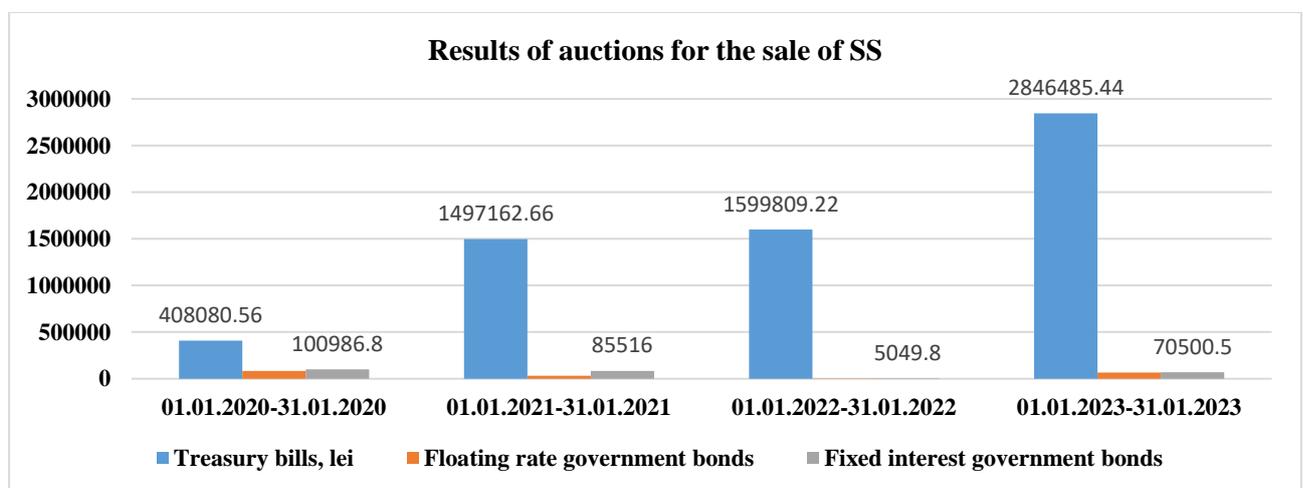


Figure 2. Results of auctions for the sale of State Securities for the months of January 2020- January 2023, lei

Source: Prepared by the author based on "Results of auctions for the sale of State Securities" <https://www.mf.gov.md/ro/datoria-sectorului-public/rezultatele-licitatiilor> (cited 16.10.2023)

Today's business environment is characterized by continuous change, and volatility, uncertainty, complexity and ambiguity are its defining features. These conditions have created opportunities for the implementation of new technologies, against the background of the evolution of consumer demand.

Commercial banks have adopted a proactive approach to these changes, orienting their strategies towards organic development, business model reorganization and the launch of innovative digital products. The banking industry is undergoing exponential evolution, transforming service channels, technologies and methods of customer interaction.

Consumer behavior has changed rapidly, moving from the traditional banking model to a preference for modern technologies, self-service and remote servicing. Banks have implemented digital initiatives that allow customers to access a wide range of products and services without the need to physically travel to branches. In addition, online banking has introduced the concept of "digital onboarding," allowing individuals to become online customers in a simple and efficient way.

Collaboration is an essential element in this ever-changing business environment. Both internally and externally, success involves cooperation between employees, customers and implemented systems.

This aspect is also valid for commercial banks in the Republic of Moldova, which must work in close collaboration with state institutions to achieve their common objectives.

At the state level, development and prosperity require the involvement of all public institutions and entities operating on the country's territory. Commercial banks have an important role in this process and harmoniously collaborate with state institutions to achieve the main objectives and contribute to the development of society as a whole. This collaboration is essential to ensure a solid foundation for economic growth and population well-being.

Commercial bank-economic agent, directly participating in the formation of public financial resources.

We analyzed the banking system as a link in the "bracelet" of institutions that contribute to the optimization of the fiscal management process of the obligations towards the state of economic agents and natural persons. But at the same time it is very important to mention that commercial banks are also financial institutions that are subordinate to state institutions, and at the same time they are also economic agents that carry out entrepreneurial activity, obtain income, respectively they are taxpayers that honor their tax obligations on time. Commercial banks contribute by paying taxes and fees both to the revenues of the state budget and to the budgets of administrative-territorial units.

The taxation regime of commercial banks in the Republic of Moldova is based on a series of taxes and fees that apply to financial institutions in the country. The main aspects of this taxation regime relate to the net income tax (the rate of 12% applied to the income obtained from the entrepreneurial activity). This tax is applied to the net profit obtained by the bank during a fiscal year and is determined according to the tax legislation in force.

There are also special fees that apply to banks, such as the bank deposit guarantee fee. This is a fee that banks pay to insure their customers' deposits should the bank experience financial difficulties. Value added tax, another tax owed by commercial banks, for the services they provide. This includes charging banking services such as transaction fees and other financial services. All according to art. 103, paragraph 12 (letters a-g), some financial services performed by commercial banks are VAT-exempt supplies without the right of deduction, such as: granting or transmitting credits, credit guarantees, other guarantees of cash operations and crediting, operations related to the record of deposit accounts, including deposit, settlement and budget accounts, etc. For the other services offered by commercial banks, the VAT rate of 20% is applied.

If we are to analyze the obligations of commercial banks, due in the local budgets, we mention the obligation related to the property tax. Commercial banks may be subject to property tax on the buildings, land and other assets they own. The rates and thus the amount of property tax may vary depending on the value of the assets and local regulations. The tax for the development of the territory is another obligation that commercial banks have, which is calculated from the total number of employees and is paid into the local budgets. In the same vein, commercial banks have the status of employer, which is responsible for calculating, withholding at the source of payment, transferring the fiscal obligations related to salary payments (income tax from salary payments, mandatory medical insurance premiums), and of course, social security contributions (24% of the total payroll), as well as reporting, submitting tax returns.

If commercial banks use advertising to promote their services, they may be subject to advertising fees depending on local regulations. There are other local taxes and fees that may vary depending on the location and specific business of the bank. These may include, for example, environmental charges or sanitation charges.

So, we conclude that commercial banks, both from the Republic of Moldova and from other member states of the European Union, have an ordinary tax regime, similar to that applied to economic agents carrying out an entrepreneurial activity, without any exemptions or deductions, being different only tax application rate. There are, however, in international practice, commercial banks that individually approve a tax regime, which they apply in their current activity and in their relations with clients or other state institutions.

Conclusions.

In conclusion, through their activity, banks carry out mechanisms for collecting temporarily available financial resources and, at the same time, place them with commercial institutions, economic agents, households, etc. that need capital supply. In this way, banks fulfill an essential role of financial intermediation.

Commercial banking is an essential piece of the tax administration puzzle. By collecting and reporting financial information correctly, facilitating tax payments, applying strict regulations and providing information on undeclared accounts, commercial banks contribute significantly to increasing the quality of tax administration and optimizing the tax management of taxpayers' obligations. These institutions not only help in making taxpayers pay, but also in ensuring fairness and transparency in the tax system, which is essential for a country's sustainable economic development.

In order to improve the process of collaboration between commercial banks and state institutions in the tax field, we propose the following measures:

1. informing the banking business environment about the changes and plans in the field of tax administration that may affect their activity;
2. organizing work sessions to analyze and properly understand the changes that have occurred in the field of fiscal administration and to implement them effectively in daily activity;
3. identifying, in collaboration, the solutions for the problems that may arise in the fiscal administration process;
4. research and implementation of digital solutions that reduce costs and facilitate collaboration between commercial banks and state institutions in the fiscal field.

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6. Hotărârea Băncii Naționale a Republicii Moldova cu privire la aprobarea Regulamentului privind suspendarea operațiunilor, sechestrarea și perceperea în mod incontestabil a mijloacelor bănești din conturile bancare: nr. 375 din 15.12.2005. *Monitorul Oficial al Republicii Moldova* 06.01.2006, nr.1-4 art. 06
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