

**TAX ON INCOME OBTAINED FROM CRYPTOCURRENCY
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Abstract

The following research is aimed at individuals tangentially involved with digital or virtual currencies, who are increasingly facing questions about how to declare income derived from trading these financial instruments. The purpose of the research is to present the tax treatment of transactions with cryptocurrencies in the part related to the taxation of the income of legal entities and individuals obtained from the activity of trading with virtual currencies according to the legislation of the Republic of Moldova, as well as the practice followed in other countries.

The issue of taxation of these types of income is a current one both at the level of the legislation of the Republic of Moldova and at an international level, given the fact of abundant flooding of the world economy with an enormously large number of cryptocurrencies without which today the financial-banking system would look like a quaint one. It is worth mentioning that the clarity of the tax legislation regarding the taxation of new types of income, or the synchronous advancement of the tax legislation with the up-to-date needs of the taxpayers is a priority both for the institutions that collect the sources of the state budget, as well as the income payers. In other words, increasing the clarity of the tax legislation and the tendency to align with international standards and practices ensure greater efficiency in the successful administration of state revenues and an upward growth in the number of compliant taxpayers. At the same time, this research aims to examine the causal link between the harmonization of legislation to the needs of the market with the level of compliance of taxpayers and receipts to the state budget. The scientific methods used in the study are as follows: analysis of the legal framework governing the research, synthesis of information, comparison to identify distinctive features, deduction of challenges.

Keywords: *tax on income, cryptocurrency, subject of imposition, taxpayer, object of imposition, tax rate*

1. Introduction

Tax on income is a natural juridical-fiscal category for the state, being one of the funds necessary to achieve its economic and social goals, providing citizens with public goods and services [1]. As the economic Adam Smith has mentioned, the nature of mandatory payment for all natural and legal persons characterizes this resource as the basis for the emergence and development of the state by covering public expenses [2].

For tax income payers the obligation of taxation is a barrier that is somehow exceeded, which we cannot say about other principles of tax. A skepticism addressed by researchers and discussed to this day by society as a whole is the character of tax equality. In this context, the English philosopher and economist John Stuart Mill intervenes with a special principle in the matter of taxation, establishing that taxation must have an equal character for those who contribute on their own to the formation of the state budget, i.e., for taxpayers. In this sense, there is a continuous tendency of the legislator to ensure a uniform character of taxpayers in front of the law, which looks more and more undifferentiated at the income of taxpayers to be taxed with a tax on income.

The evolution of technological development in various fields also determined the emergence of various organizational-legal forms of entrepreneur, which in turn have the primary purpose of obtaining benefits or income. Everything would be much simpler if the legislator found a perfect way to tax income regardless of their source, respecting all those principles on which taxes and fees are based: neutrality of taxation, certainty of taxation, fiscal equity, fiscal stability, tax yield. Analyzing the tax on income in different countries, we can see that in terms of fiscal legislation, it has evolved into a direct dependence on the evolution of income types. Thus, the state, through its fiscal bodies, constantly examines new forms of income from the point of view of the need to impose them in order to ensure compliance with fiscal equity and the other principles that were mentioned.

Currently, the provisions of the current legislation of the Republic of Moldova do not regulate the use of virtual currency for trading or any related exchange methods on its territory. Cryptocurrency is not a form of electronic currency within the Law on payment services and electronic currency no. 114 of 18.05.2012 [3], and the activity regarding the issuance of the virtual currency and its trading is not subject to supervision by the authorized body. At the same time, it is known that starting from the period of 2008, when the most used cryptocurrency, called Bitcoin, was registered, the states of the world collided with know-how in the field of traditional currency operations. In addition to the fact that the laws of the states of the world did not regulate such a financial instrument or such a financial asset, the users of these virtual currencies went further, so that the entrepreneurial spirit invented ways to earn income on account of this technological progress. As a result, the tax legislation collided with a new task, namely the need to introduce into the legislation the provisions to regulate the new source of income obtained from the trading of cryptocurrencies, including the specification of how to determine and declare the tax obligations from these incomes.

Despite the fact that the provisions of the legislation of the Republic of Moldova do not regulate the use of virtual currency, people use various electronic platforms where they transact with an impressive variety of cryptocurrencies, thus obtaining income from these operations that can be converted into one of the trust funds.

Hence, the following study will focus on the research of the issue regarding the tax on the income of people who obtain benefits from cryptocurrency trading, being examined in terms of the way of regulation both in the Republic of Moldova and in other countries, whose experience is a model based on which modernization and adaptation of domestic legislation to European and international standards and practices in the field take place.

2. The degree of investigation of the problem at present and the aim of the research

Certainly, the current study presents an actuality through the presence of research related to cryptocurrencies and transactions with them both at the national level but especially at the international level, and at the same time, the taxation of revenues from transactions with cryptocurrencies is little researched. In this context, the aim of the following research is to examine the national and international provisions regarding the taxation of income from cryptocurrency transactions, the comparison of the respective practices, and the examination of the possibilities of application in the Republic of Moldova.

In the context of a trend of globalization and economic internationalization, society fails to properly adapt the legislation for adequate regulation of transaction and taxation processes. While some countries such as the USA and the United Kingdom are trying their best to take advantage of the opportunity of so-called “transparent data” to streamline business processes and to even create a better fiscal and legal framework, others are only now starting to look closely to cryptocurrency (India, Russia) or, on the contrary, completely ban their use (Nepal, Bolivia) [15]. All of this complicates the processes given the fact that cryptocurrencies are outside the legal framework, and the purchase and trading of virtual currencies takes place on an international exchange located in multiple jurisdictions, which makes it much more difficult to tax such transactions.

In order to achieve the goal of the research, the following tasks should be completed:

- examination of national provisions regarding the possibility of taxation of income from trading with virtual currencies;
- examination of international practice in the matter of taxation of the respective incomes;
- comparison of international practices with the national tax regime;
- evaluating the possibility of applying or adapting the national fiscal legislation to international practices.

3. Methods and materials applied

The study begins with research regarding cryptocurrencies and electronic currencies, transactions made with them, and examining the possibilities of taxation of income derived from cryptocurrency transactions. From a methodological point of view, it was desired to carry out the review of the fiscal and banking normative framework starting from the exhaustive analysis of the provisions of the Law on payment services and electronic money [3], Fiscal Code of the Republic of Moldova no. 1163-XIII of 24.04.1997 with subsequent amendments [6]. Based on the conducted research, some questions were also established: Is cryptocurrency a means of payment or a financial asset, or a mix of the two? What are the possibilities and international practices of taxation of income from cryptocurrency transactions? These questions will be studied and presented by describing them below.

Methods of scientific research were used in the following research as follows: analysis of the legal framework governing the study, synthesis of information, comparison to identify distinctive features, deduction of challenges, through which it was possible to present the conclusions related to the research.

4. Results obtained and discussions

From the point of view of the importance of the researched issue, we would like to mention the aspect that derives from the permanent tendency to increase the monetary mass involved in trading with virtual currencies, including the volume of investments in the cryptocurrency mining technique. The cryptocurrency market is developing very dynamically, nowadays reaching an extraordinary market capitalization. As can be observed in figure 1, the graph of the market capitalization of cryptocurrencies shows an increase especially in recent years, except for some fluctuations, which can be justified by the high volatility of virtual currencies. The capitalization of virtual currencies on the global market today is \$1.27 trillion, a variation of -37.53% compared to last year [4]. Currently, the market capitalization of Bitcoin (BTC) is \$559 billion, representing Bitcoin's priority of 44.21%. Meanwhile, the market capitalization of Stablecoins is \$132 billion and has a share of 10.45% of the total market capitalization of virtual currencies [4].

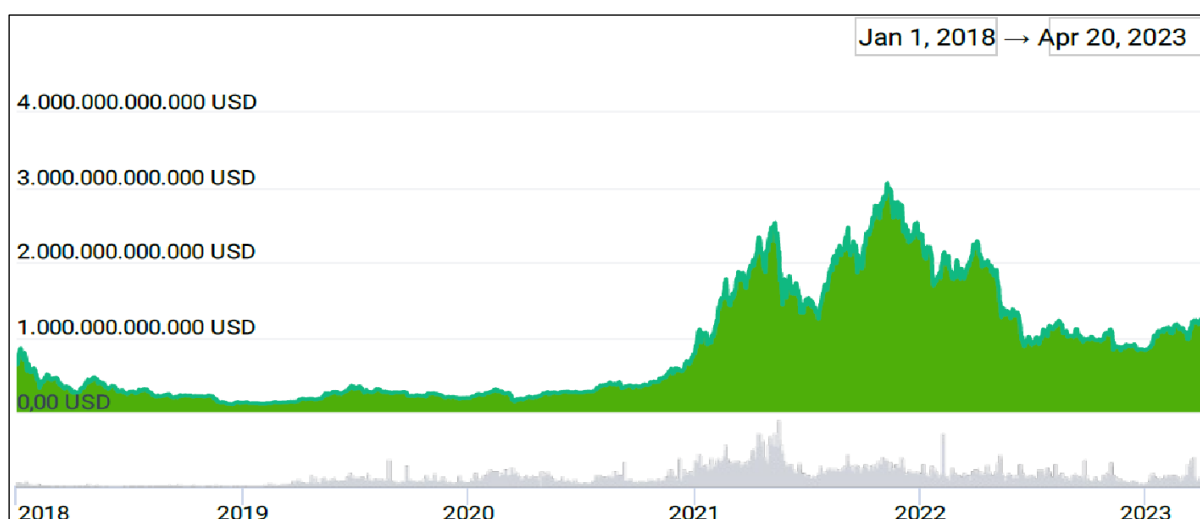


Figure 1. Graph regarding the total market capitalization of cryptocurrencies

Source: <https://www.coingecko.com/ro/global-charts> [4]

Cryptocurrency is a new phenomenon in the global economy, therefore, no unique foreign legal phenomena associated with it, which do not have scientific and practical significance for the Republic of Moldova and other countries have been identified. In this context, if we are to examine the systems of taxation on income from transactions with virtual currencies, we are going to mention that they depend on the formulation of the definition of cryptocurrency. Accordingly, if the cryptocurrency is designed in legislative acts as a means of payment and is equivalent to other units of fiat currencies, income tax is charged for each use of it. At the same time, if the virtual currency is identified with property or assets that can generate income (such as stocks, bonds, etc.), the income from its trading is subject to capital asset tax. There are also mixed tax approaches to cryptocurrencies. The tax regimes examined are presented in figure 2.

Although the legislation of the Republic of Moldova does not currently regulate the status of virtual currency or cryptocurrency and does not recognize it even from the aspect of electronic payment currency, however from the point of view of a property with a certain

value it is qualified as an asset of a physical person who owns under one form or another a right to this currency. According to the current regulations, the physical person who obtains an income from financial investments made in cryptocurrency is treated from the point of view of tax legislation as an income obtained from capital investments and from investments in financial assets. According to art. 14 para. (1) lit. b) and lit. c) from the Fiscal Code [6], the said income is subject to tax on income. One of the conditions in this sense, according to art. 12 point 5 of the Fiscal Code [6], is that the taxpayer's participation in the organization of the activity should not be regular, permanent, and substantial. We draw attention to the fact that the legislation vaguely and interpretably defines this activity, which can cause various obstacles to the application of the law by honest and less honest taxpayers. However, according to the explanation presented by the State Fiscal Service on its website, the income obtained by a physical person resident in the Republic of Moldova from the alienation of cryptocurrency qualifies as taxable income, and the respective currency is assigned to the capital asset category [7].

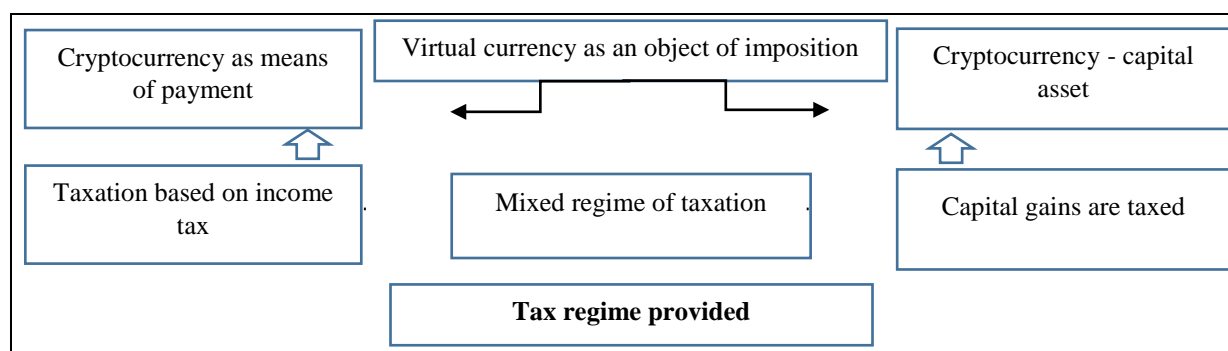


Figure 2. Taxation of income from virtual currency trading

Source: developed by the authors based on the information in the article “Сравнительный обзор международной финансовой политики в сфере налогообложения цифровых активов”[5]

Thus, in the sense of art. 39 para. (1) of the Fiscal Code [6], if the physical person holding cryptocurrency does not use this asset in the business activity, the cryptocurrency qualifies as a capital asset. According to the mentioned provisions, the regulation of capital growth and loss is applied both to the physical person who is a resident and non-resident of the Republic of Moldova and who do not practice entrepreneurial activity and who sell, exchange, or dispose of capital assets in any other form.

Method of capital growth taxation established in art. 40 para. (7) of the Fiscal Code [6], stipulates that the amount of capital growth during the tax period is equal to 50% of the excess amount of recognized capital growth over the level of any capital losses incurred during the tax period. The size of the increase or loss of capital resulting from the sale, exchange, or other forms of alienation of capital assets is equal to the difference between the amount received (income obtained) and the value base of these assets. According to the Order of the Ministry of Finance “List of confirmatory documents that are grounds for confirming the value base of capital assets” no. 40 of February 6, 2018 [8], a list of confirmatory documents is approved that represent grounds for confirming the value base of capital assets that are the basis for calculating the capital increase. Respectively, if the person does not have a document from the list of confirmatory ones, the capital asset will be calculated with a value base of zero lei.

Generalizing the aspects of the taxation of income obtained from transactions with virtual currency, we established that, even if the provisions of national legislation do not regulate virtual currency at the national level or foreign currency, not even as a means of payment, the income obtained from operating with cryptocurrencies is treated as taxable on the territory of the Republic of Moldova.

According to art. 37 of the Fiscal Code [6], the subject of increase or loss of the capital are taxpayers, which are residents and non-residents of the Republic of Moldova, that do not practice entrepreneurial activity and who sell, exchange, or alienate capital assets in any other form. Thus, according to art. 83 of the Fiscal Code [6], individuals (citizens of the Republic of Moldova, foreign citizens, stateless persons, including members of companies and shareholders of investment funds) who have obligations regarding payment of tax are obliged to submit the declaration regarding the tax on income. According to the order of the Ministry of Finance “Regarding the approval of form CET18 – Declaration of the individual regarding tax on income and the Regulation regarding on how to complete it” no. 150 of 05.09.2018, the Declaration form of the individual regarding tax on income (form CET18) was approved [9]. Thus, if the beneficiary of taxable income must determine the amount of the obligation and pay tax on income, he must submit the Declaration of the individual regarding the tax on income and pay the unpaid tax on income to the state budget.

At the same time, it should be noted that, until 2020, the provisions of the Fiscal Code [6] stipulated that the subjects of capital increase or loss are all taxpayers (individuals or entities), residents, and non-residents of the Republic of Moldova, who sell, exchange or dispose of capital assets in another form. Thus, according to the editorial up to 01.01.2020, legal entities, like individuals, had the possibility to buy and sell capital assets within the meaning of the provisions of Chapter 5 Growth and loss of capital from the Fiscal Code [6], to determine and declare income from the capital growth, being a taxable source, was to be taxed by legal entities. Accounting for income tax expenses occurs by increasing expenses and current liabilities at the same time.

Thus, according to the editorial up to 01.01.2020, legal entities, like individuals, had the possibility to buy and sell capital assets within the provisions of Chapter 5 Growth and loss of capital from the Fiscal Code [6], to declare and determine income from the increase in capital. According to art. 18 of the Fiscal Code [6], the increase in capital, being a taxable source, was to be taxed by legal entities by applying the quota established in art. 15 of the Fiscal Code [6].

According to the way of completing the Declaration regarding the tax on income for the fiscal period (form VEN12), the approved form for declaring the fiscal obligation regarding tax on income by legal entities, in annex 1.2 D Result from operations related to capital assets, which are not completed starting with the fiscal declaration period of 2020, the legal entity was to reflect the income from the operations with the capital assets found in the financial accounting for each group of assets, which is defined as the capital asset. The result obtained as following the calculations in annex 1.2 D are reflected in line 0208 of annex 1D Adjustment (increase/decrease) of income according to the provisions of the tax legislation, and these are later generalized and reflected in the Declaration regarding tax on income for the tax period (form VEN12) to determine taxable income and the amount of tax on income.

The accounting of tax on income expenses for legal entities takes place in strict accordance with the National Accounting Standard “Expenses”, approved by Order of the Ministry of

Finance nr. 118 of 06.08.2013 with subsequent amendments [10], which establishes that the determination of expenses takes place by applying to the amount of taxable income tax rate established by the Fiscal Code [6]. Accounting for tax on income expenses occurs by increasing expenses and current liabilities at the same time.

Starting with 01.01.2020, with the exclusion of legal entities from the category of subjects of the capital increase in the sense of the provision of art. 37 of the Fiscal Code [6], the purchase of cryptocurrencies by a legal entity can no longer be considered as capital assets. At the same time, examining the provisions of art. 12 of the Fiscal Code [6], it can be acknowledged the existence of the notion of investment income – income obtained from capital investments and investments in financial assets, if the taxpayer's participation in the organization of this activity is not regular, permanent and substantial, and the notion of financial income – income obtained in the form of royalty, annuities, from the leasing of goods, lease, from usufruct, from the exchange rate difference, from the assets that entered free of charge, other income obtained as a result of financial activity, if the taxpayer's participation in the organization of this activity is not regular, permanent and substantial. Thus, we establish that the legal entity, when conducting transactions with virtual currencies, could reflect the income obtained from these operations as investment or financial income. In the part related to the taxation of these revenues, according to the established general taxation rule, these revenues are to be taxed according to art. 15 lit. b) of the Fiscal Code [6], with a tax rate of 12%.

It is worth mentioning that, under the Currency Regulation Law no. 62 of 21. 03.2008 [11], the National Bank of Moldova warns users of payment services that virtual currencies and related exchange methods are not subject to regulation on the territory of the Republic of Moldova. Consequently, the funds of the users are not protected [12]. Within the lines of what was mentioned above, incomes obtained from investments in financial assets of legal entities are not regarded as illegal, especially if the person calculates and pays the tax on income to the state budget from these incomes.

The following study also aimed to identify the characteristics of the taxation of cryptocurrency assets in various countries of the world in order to take over the most successful practices in the regulation of this field, including shedding light on the provisions of national legislation regarding the correct determination of the object of fiscal regulation respecting all principles such as fiscal equity, tax certainty, fiscal stability, and others. The aspect of legalization of cryptocurrencies in different states of the world is important, which counts more than 120 states. However, the degree of legalization, as well as the presence or absence of various restrictions on virtual currency transactions, still differ significantly from state to state.

As for legalizing the circulation of virtual currencies, buying and selling them, and making other transactions with digital assets, including investing in these types of assets or mining them, the legislation of each country looks at these things differently. Hence, in October 2020, the G20 approved a roadmap (Financial Stability Board, 2020) [13] which sets out to include improving cross-border payments to solve long-standing problems such as high costs, low speeds, limited access, and lack of transparency in such payments. Precisely for this reason, it was decided that the digital currencies of the central bank have a special role to play. Central bank digital currencies are defined as central bank digital money denominated in national units of account that can be used for retail payments and other settlements [13].

There are many interesting facts about cryptocurrency, for instance, in Western countries, the inclusion of Bitcoin and other cryptocurrencies in the list of means of payment for goods and services has already become a trend. Currently, there are more than 100 thousand companies worldwide that accept BTC, such as Microsoft, Amazon, eBay, WordPress, JM Bullion, and even KFC sell their chicken for Bitcoin and Playboy accepts cryptocurrency for a subscription [16]. The global transition to the virtual currency payment method, i.e. the blockchain financial system, is only a matter of time.

A survey conducted by Bank for International Settlements (BIS) employees in 2020 among more than 60 central banks showed that the pandemic increased central banks' motivation to develop retail central bank digital currencies, has put on the forefront the goal of providing access to central bank money during emergencies and the need to supplement cash payment methods where social distancing is required [14]. Thus, the question of whether digital currencies of central banks will change the use of cash in its physical form as a means of payment or savings in deposit accounts will depend on the decisions of the central bank. What is certain is that the decisions, as well as the extent and speed of the introduction of central bank digital currencies, will certainly vary from country to country and will depend on the payment infrastructure, existing payment instruments, and regulations regarding virtual currency trading.

Currently, the regulation of the taxation of virtual currencies goes in step with the way of recognition and acceptance of cryptocurrencies in the economic and financial life of states, which explains the variety of ways of taxing the income obtained from the possession or use of virtual currencies. So, as long as in some states such as Afghanistan, Algeria, Bolivia, Egypt, Nepal, and others, cryptocurrency is prohibited in any form of possession or use, there can be no question of legislation regarding the taxation of cryptocurrency income [15].

At the same time, in many states of the world, virtual currency has a different legal status, i.e. it can be positioned in the category of currency, commodity, or property, as shown in table 1.

Table 1. Legal status and scope of cryptocurrencies in some countries of the world

Country	Category regulated by law		
	Currency	Goods	Property
United Kingdom	V		
Germany		V	
Canada			V
Czech Republic			V
USA			V
France		V	
Japan			V
Switzerland			V

Source: elaborated by authors based on Bitcoin legality by country or territory, <https://ro.wikipedia.org/> [15]

If we are to analyze the evolution of cryptocurrency cataloging, we can mention the experience of the USA, where in 2013 the treasury classified bitcoin as a decentralized virtual currency, and in September 2015 the "American Commodity Futures Trading Commission" (eng. Commodity Futures Trading Commission - CFTC) classified bitcoin as a "commodity", but according to the US Internal Revenue Service (IRS), bitcoin is taxed as "property".

In the year 2023, buying and selling cryptocurrencies will be officially legalized in Kazakhstan. Citizens will be able to transact digital assets for tenge through banks, while paying one of the world's lowest fees for such transactions. In addition, Kazakhstan will be one of the first countries in the world to include a core blockchain curriculum in university programs across the country. Within this program, over 40 thousand people are expected to be trained by 2026 [16].

If we are to examine the legislation of a neighboring country such as Romania, we establish that its tax legislation provides that any profit recorded from cryptocurrencies is subject to taxation. In Romania, transactions with virtual currencies were regulated for the first time in 2019, being introduced in the Fiscal Code provisions relating to the taxation of incomes obtained in this way. According to these regulations, income from the transfer of virtual currency falls under the category of income from other sources and is subject to the specific tax regime for this category, with certain peculiarities. One of the peculiarities is that the determination of the applicable income tax and social contributions is the responsibility of the income earners, not the income payers. Even for exchanges made through trading platforms, the reporting obligation remains with the users. Thus, in Romania, the beneficiary will pay 10% income tax both on any capital gain and on any additional income obtained from crypto investment activities if the person's total income during the financial year exceeds 600 Romanian lei. Another important aspect of Romanian tax law is that crypto losses are tax deductible, meaning you can offset them against capital gains to reduce your total tax liability in a given financial year [17]. The income tax due for these revenues is determined as the positive difference between the sale price and the purchase price, including the direct costs related to the transaction. The income tax payment deadline is the deadline for submitting the Single Declaration on income tax and social contributions owed by individuals [18].

5. Conclusions

Taxes are the most important financial resource for the state and the oldest, in the order of appearance of state revenues. Based on these resources, the state can achieve the objectives proposed to society. The purpose of the developed tax policies is to make taxes more equitable, efficient, and favorable to economic growth.

Cryptocurrencies are virtual currencies, that are not regulated by a financial institution and do not involve the intervention of a third party in the relationships between two of its users, which allows the business environment to exclude part of the burden of bank fees and to interact more operatively with customers. The business is like a flowing river that carves its own path, and if it considers that electronic currency eases its existence, the state only has to offer a legal cloak to this know-how, so it can benefit as well from this tool to the possible extent, and why not, to promote it and align to the experience of the countries that derive the greatest benefits from its implementation and use.

The permanent trend of increase in the amount of money involved in trading with virtual currencies imposes new requirements on the regulatory part at a national level, but also risks and challenges for the business environment and physical person. Based on the study carried out on the taxation of cryptocurrency transactions, the existence of three directions of treatment was established: if the cryptocurrency is designated in legislative acts as means of

payment and is equivalent to other fiat currency units, tax on income is perceived for each of its use; if cryptocurrency is identified with properties or assets which can generate income (such as shares, bonds, etc.), the income from trading it is subject to capital asset tax; there are also mixed fiscal approaches to cryptocurrencies.

Another direction subject to research is the approach for taxation on income from cryptocurrency transactions and tax reporting for physical persons and legal entities in the Republic of Moldova.

The current research, by achieving the goal of studying the problems of the mechanisms of taxation of revenues based on trading with cryptocurrencies both from the aspect of the regulation of the field and from the aspect of the efficiency criterion, highlighted the existing imperfections in the tax legislation regarding the taxation of income tax on the background of the tendency to harmonize the taxation system with international standards and practices [19].

Generalizing what was mentioned in the current research, we establish that, the provisions of the legislation in different countries do not have a unique vision on how to use cryptocurrency in their economies so that some countries accept such a financial instrument, while others limit its use or prohibit it with criminal liability. At the same time, at the international level, the countries are in constant collaboration regarding the homogenization of tax treatment on income obtained from transactions with cryptocurrencies. Such standardization could guarantee the people that invest in this financial tool a certainty and legality of the activity that is carried out, and for the state, this would be a measure to prevent tax evasion. Thus, in order to align our country with international standards and practices, it is necessary to analyze the progress achieved by those that managed to introduce the new financial tool into the economy and to regulate the clear taxation of income obtained from the use of electronic currency.

Examining the national practices regarding the taxation on income from virtual currency, we conclude that the provisions of the tax legislation do not expressly present such income as being taxable or non-taxable, especially in the context of the Law on Currency regulation no. 62 of 21.03.2008, which does not regulate virtual currencies and methods related to exchange on the territory of the Republic of Moldova [11]. In this case, we consider it appropriate to review the provisions of the national legislation in order to ensure a uniform basis with the international practices for tax on income from cryptocurrency transactions, ensuring a clear and fair fiscal treatment, guaranteeing a tax rate close to states with a level of economic development like the one of Republic of Moldova, simplifying the way to declare and pay the tax for such incomes.

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Rezumat

Prezenta cercetare este destinată persoanelor care au tangență cu moneda digitală sau virtuală și care tot mai des se ciocnesc cu întrebări privind modalitatea de declarare a veniturilor obținute de pe urma tranzacționării cu aceste instrumente financiare. Scopul cercetării este de a prezenta tratamentul fiscal al tranzacțiilor cu criptomonede în partea ce ține de impozitarea veniturilor persoanelor juridice și fizice obținute din activitatea de tranzacționare cu monedele virtuale potrivit legislației Republicii Moldova, cât și practica altor state.

Problematika impozitării acestor tipuri de venituri este una actuală atât la nivelul legislației Republicii Moldova, cât și la nivel internațional, dat fiind faptul unei abundente inundări a economiei mondiale cu un număr enorm de mare de criptomonede fără de care astăzi sistemul financiar-bancar ar arata unul demodat. Este de menționat și acel fapt că, o claritate a legislației fiscale în privința impozitării noilor tipuri de venituri, ori, înaintarea sincronă a legislației fiscale cu necesitățile la zi ale contribuabililor, este o prioritate atât pentru instituțiile de colectare a surselor la bugetul de stat, cât și a plătitorilor de venituri. Altfel spus, sporirea transparenței legislației fiscale și tendința de aliniere la standardele și practicile internaționale asigură o mai mare eficientizare în administrarea reușită a veniturilor statului și o creștere ascendentă a numărului de contribuabili conformați. Totodată, această cercetare își propune să examineze legătura cauzală între armonizarea legislației la necesitățile pieței cu nivelul de conformare a contribuabililor și încasărilor la bugetul de stat. În cadrul studiului sunt utilizate metode de cercetare științifică, cum ar fi: analiza cadrului legal care guvernează cercetarea, sinteza informațiilor, compararea pentru a identifica trăsăturile distinctive, deducerea provocărilor.

Cuvinte-cheie: *impozit pe venit, criptomonede, subiect al impunerii, contribuabil, obiect al impunerii, cota impozitului*

Аннотация

Данное исследование предназначено для людей, имеющих отношение к цифровой или виртуальной валюте, сталкивающимся с вопросом относительно способа декларирования доходов, полученных от операций с криптовалютами, а именно с налогообложением доходов юридических и физических лиц, полученных от деятельности по торговле виртуальными валютами, согласно законодательству Республики Молдова, а также практика других государств.

Вопрос налогообложения этих видов доходов является актуальным, как на уровне законодательства Республики Молдова, так и на международном уровне, учитывая факт обильного наводнения мировой экономики колоссально большим количеством криптовалют, без чего, сегодня финансово-банковская система выглядела бы устаревшей. Следует также отметить, что ясность налогового законодательства в отношении налогообложения новых видов доходов, или синхронное совершенствование налогового законодательства с современными потребностями налогоплательщиков, является приоритетом как для учреждений, собирающих источники государственного бюджета, так и для плательщиков доходов. Иными словами, повышение прозрачности налогового законодательства и стремление к приведению его в соответствие с международными стандартами и практикой обеспечивают повышение эффективности успешного управления государственными доходами и увеличение числа добросовестных налогоплательщиков. В то же время данное исследование направлено на изучение причинно-следственной связи между приведением законодательства в соответствие с потребностями рынка с уровнем соответствия налогоплательщиков и поступлений в государственный бюджет. В исследовании используются методы научного исследования, такие как: анализ нормативно-правовой базы, регулирующей исследование, обобщение информации, сравнение для выявления отличительных признаков, дедукция проблем.

Ключевые слова: *налог на прибыль, криптовалюты, субъект налогообложения, налогоплательщик, объект налогообложения, налоговая ставка*

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