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The State Budget for 2005

Editorial

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The State Budget for 2005 cannot be understood in itself without including the tax amendments of the last years and those that were more recently introduced, as is the case of the property taxation regime.

I would like to take the opportunity to review the recent past and present, to place the future into perspective.

In fact and it should be emphasized that the management of companies should not be pushed by events but has to be a prospective management, at least in the medium term, taking into account the existing tax structure and its probable evolution.

We have recently seen several oscillations in the tax regime of holding companies (Sociedades Gestoras de Participações Sociais – SGPS), which culminated in their tax transparency, following the example of many European companies. As concerns capital gains and after going back to a competitive system in regard of financial holdings, with a tax exemption in certain terms, the tax burden on the capital gains obtained with real estate has also been reduced.

On the other hand, we have seen increasing difficulties in the so-called international and domestic tax planning. At an international level, the anti-abuse rules, the exchange of information, the withholding tax that exist or is to be implemented shortly on the income distributed to residents outside the European Union, etc., have rendered the planning that, a few years ago, was simply achieved by the so-called “off-shores”, particularly difficult.

At a domestic level, the so-called anti-abuse clause and the rules applicable to transfer prices represent a very strict control of company management, introducing an especially dangerous arbitrariness of the Tax Authorities and unsettling medium and long term management.

The great novelty of 2003 / 2004 is the Property Tax. We must immediately point out a very positive aspect: the elimination of the Inheritance and Donations Tax on transfers to descendants or the spouse. This is a social requirement that had been presented by me a number of years ago in a proposal to the Government, which permits, without tax fraud, the transfer of assets to descendents who already enjoyed those assets and in relation to which they had legitimate expectations.

The justification of the new property taxation was that those who paid a lot should pay less and those that paid nothing or very little should start paying something. Thus the reduction of tax rates and the revaluation of property values. Expecting that the final result would be a better distribution of the tax burden which in all would remain unaltered. However, all will depend on the evolution of the real estate evaluations. We may reach the conclusion, although hopefully not, that those who paid little will start paying a lot and those who paid a lot will pay even more, notwithstanding the reduction in the tax rates.

In any event, the present determination of property values of real estate, promoted by the Reform, should lead to a careful reassessment of the tax management of companies and families.

In the near future, attempts to increase the tax burden in respect to taxes that raise less social sensitivity or through the costs in tax benefits or extension of the tax liability are to be expected. The so-called “fight against tax fraud and tax evasion” may continue to justify a lessening of the rights and guarantees of the taxpayers.

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Revaluation of the Tax Expenditure

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"Unless attention is given to tax expenses, a country does not have its tax or budget policy totally controlled"

There is admittedly an excessive and extremely dispersed number of tax benefits in Portugal, with a tendency, once foreseen and attributed, for its continuance. Between 1998 and 2003 the ceasing tax income (tax expenditure) associated with benefits in taxes over income (IRS and IRC), VAT, Car Tax and Tax over Petroleum Products has more than duplicated and, between 2000 and 2003, increased in approximately 40%. Paradoxically, the neo-liberal thinking tends to depreciate the tax incentives and to overrate its perverse effects. And the same will occur in some other European countries.

Therefore, the effective result of the tax benefits deserves to be discussed, which reminds us of the concern of quantifying tax expenditure so that the losses of tax income associated to tax benefits with the effects that is intended to be reached at the time of its adoption may be finally confronted. In Portugal, in 1998, a Work Group that was created by the Minster of Finance at the time for the revaluation of the tax benefits and a Commission set up for the review of the former Law of the State Budget Framework proposed that tax expenditure be accounted and the object of controls similar to that of direct expenditure. In fact, what may be found in the several Bills of the annual State Budget submitted by the Government to Parliament are still rudimentary attempts of quantifying tax expenditure inherent to only some of the tax benefits and solely related to some of the main taxes, mostly accompanied by one sole explanatory paragraph. However, in this respect, the Portuguese General Tax Law (1999) laid down that, without prejudice to acquired rights, the rules on tax benefits are *temporary*: *to remain in force during a period* of five years, if another period has not been determined and save in those cases whereby the tax benefits have a structural character, by nature. The actual Law of the State Budget Framework (2001) also innovated in this matter, imposing a *specific* chart for ceasing tax income of integrated services, of independent services and funds and of social welfare. However, in the Law of the State Budget for 2003 the referred chart – the first to be elaborated – still did not detail the "ceasing income" by benefit and by tax, but only by tax and only covers those taxes already set forth in the informative attachments to the Bills of the State Budget of previous years. Moreover, it is a chart with a merely *indicative value but, even so, with immediate consequences*, namely additional duties of rendering periodic information to Parliament.

It is urgent to promote – as probably in other European countries, but especially in Portugal -, as has been announced on several occasions by the Portuguese Government, a revaluation of tax benefits, after an analysis of the type "cost-benefit". If the primordial intention of the authors of the General Tax Law was to guarantee some stability in what concerns tax benefits, what is certain is that the Work Group set up for the revaluation of tax benefits, of 1998, proposed the definition of this time frame already with a *dual* intent: not only (i) to safeguard eventual changes of regime during a determined period, but also (ii) to permit, as is curial, a periodic evaluation of the tax benefits, obviously aiming for its non-continuance after the termination of public interest subjacent to its creation. This seems to be the most consistent interpretation with the legislative authorisation conferred by Parliament for the test of the Portuguese General Tax Law, which intended, as concerns tax benefits, "to assure its predictability, in compliance to the principle of legal security" and permit the "periodic evaluation of the respective results", thus being possible to conclude that the rules on tax benefits ***only* remain in force during that period of five year**. However, as it happens, this bold interpretation would have had as a consequence in Portugal that, on December 31st, 2003, all the rules on non-structural tax benefits already enforced at the time the General Tax Law (1999) entered into force, which were not the object of being maintained or subsequent alteration, would have become extinct (due to expiry), restoring the taxation-rule. However, this imposed a task that was not performed in due time: to proceed with the *revaluation* of a large majority of the tax benefits – maintaining them or altering them or leaving them to expire – and would have probably permitted, even in a conjunctural government deficit, as announced in the last elections campaign, a "tax impact", with the reduction of the general rate of IRC to 20% which, notwithstanding, was reduced, in 2004, to 25%. ■

Relevant measures regarding IRC

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Elimination of double taxation

In accordance with the new Article 46 (10) of the IRC Code, the regime of elimination of economic double taxation to distributed profits, which consists in the deduction of the profits received under the scope of the partner, will cease to be applicable when it is concluded that there is an abuse in the legal structures aimed to reduce, eliminate or delay the payment of taxes, which is considered verified when:

- The distributed profits have not been subject to effective taxation or originate from income to which this regime of elimination of economic double taxation to distributed profits is not applicable.

The ambiguous form that this new rule is worded raises countless questions as to its interpretation and practical application, of which we particularly emphasize the following:

- What should be understood as “effective taxation”?

- Is the regime of elimination of double taxation applicable or not when the profits initially deriving from a productive activity effectively taxed are distributed by a holding company (SGPS) to its parent company, which is also a holding company (SGPS)?

- The requirement of “effective taxation” and “origin of the income” are cumulative or alternative?

- Which are the types of income to which the application of this regime will be forbidden? Only those incomes deriving from States outside the EU? Or also other types of income, such as interest, royalties, operational income, etc.?

Considering the sensitivity of this matter and the need for economic agents to have a coherent and stable interpretative basis, it is expected that interpretative directives will be issued by the Tax Administration on the subject.

Minimum amount of IRC – Limitation of the advantage of tax benefits and of other regimes

In accordance with the new regime, the IRC liability, after deduction of the tax credit for international double taxation and deduction of tax benefits, cannot be lower than 60% of the IRC that would be due by the taxpayer if no tax benefits applied, with the exception of benefits of a contractual nature.

The regime is applicable to entities that mainly undertake an activity of a commercial, industrial or agricultural nature that is not covered by the simplified regime and to non-resident entities with a stable establishment in Portuguese territory. The “tax benefits” for the purpose of this calculation are also defined:

- The incentives for the creation of jobs and for the purchase of shares under the scope of privatisations;
- The incentives for social, cultural, environmental, sports and educational patronage and for scientific patronage;
- The benefits in the modality of earned income allowance;
- The tax incentives for activities in the interior:

The prepayment of reincorporations and amortizations resulting from the revaluation made under tax legislation.

The amount of the supplementary contributions to pensions funds and equivalent, above referred, should be added to the amount of the tax benefits for the purpose of calculation of the minimum amount of IRC. The amount of the usable tax losses which are transferred under the scope of mergers, demergers, entry of assets or transfer of stable establishments should be added to the amount of the tax benefits for the purpose of this calculation. ■

From the abolition of tax credits in Individual Income Tax (IRS) to " tax amnesty "

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As concerns tax credits in IRS, this State Budget contemplates a true radical change, abolishing five types of tax credits, three of which associated to investment / savings and the two others related with expenditure, which are:

- Values applied in individual Retirement Savings plans ("Planos Individuais de Poupança-Reforma" - PPR), Education Saving plans ("Planos Individuais de Poupança-Educação" - PPE) and Retirement / Education Savings plans ("Planos Individuais de Poupança-Reforma/Educação" - PPR/E);
- Values applied in House Savings accounts ("Contas Poupança-Habitação" - CPH);
- Values applied in Shares Savings plans ("Planos Poupança-Acções" - PPA);
- VAT incurred with goods and services;
- Expenses with legal counselling.

The effect of the loss of the referred tax benefits of individuals may be better assessed through the analysis of the chart below:

	Investment / Expenditure	Deductions in 2004	Deductions in 2005
PPR, PPE E PPR/E	€ 2.645,64 (5% of the income included)	(25%) > 50 years - € 661,41 35-50 years – € 698,48	0
CPH (per couple)	€ 2.302,28	(25%) € 575,57	0
PPA´s	€ 2.666,00	(7,5%) € 199,95	0
VAT Goods /	€ 263,16	(19%) € 50,00	0
Legal Counselling	€ 698.55	(20%) € 139,71	0
Total	**€ 8.575,63**	**€ 1.626,64** **€ 1.663,71** **€ 1.692,78**	0

After looking at the chart, it is clear that a taxable person who in 2004 used all the above referred savings systems and the two deductions related with expenditure would have saved between € 1.626,34 and € 1.692,78 in IRS, through an investment – with the consequent savings – of € 8.575,63. When dealing with a couple, the joint tax savings would range between € 2.677,71 and € 2.809,99.

Still in accordance with the above chart, in 2005, the savings associated to investment in the above referred systems would be, whichever the amount invested, of "0".

It is naturally a heavy invoice to burden on the taxpayers of the so-called "middle class", who statistically better fulfil their tax obligations, and, in this manner, verify that their taxable income is significantly increased or, under another perspective, are discouraged to make savings in products of the Portuguese financial system.

As concerns IRS, a legislative intention, called "incentives for the regularisation of capital kept abroad" should also be pointed out.

The State Budget for 2005 foresees that the Government will present a draft law to Parliament allowing the tax regularisation of movable assets that are kept by individual persons abroad provided that they pay tax corresponding to 5% (five percent) of those assets.

This is a simple programmatic rule that foresees a "tax amnesty" for the import of capital – which implementation, in light of the present political situation, is unknown – as already occurred in Italy, in Belgium and in Germany. However, there is no reference to tax crimes, resulting from the lack of declaration of those values, thus being free from taxation in Portugal – which, as is known, constitutes the crime of tax evasion – nor concerning the introduction in the financial system of those values, which represents a crime of money laundering.

Consequently, the referred regularisation of capital kept abroad may be a "poisoned gift" because, the tax situation being regularised through the above referred payment, would trigger proceedings of a criminal nature, necessarily carried out by the Public Prosecution Department, to assess eventual crimes of tax evasion and money laundering.

These criminal aspects will also probably be contemplated in the "amnesty" but until then … I would not rely on it ■

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[1]Depending on age, considering that the tax benefit of PPR, PPE and PPR/E will decrease according to the age of the beneficiary, as shown above.

[2]As referred in the chart, only the limit of the benefit linked with the CPH is related to the couple, all the others relate to each individual taxable person.

Madeira Free Trade Zone

Division of the global profits of financial institutions

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A new article 33-A is introduced to the Tax Benefits Statute ("Estatuto dos Benefícios Fiscais" - EBF) related with the financial activity carried out in the Free Trade Zones of Madeira and Santa Maria of credit institutions and financial companies established in Portugal.

Under the terms of this new provision, the referred entities that do not exclusively undertake activities in the Free Trade Zones will have its total profits that may be attributed to activities carried out in the Free Trade Zones reduced from 20% to 15%.

Entities that do not exclusively carry out its activity in the Free Trade Zones but do so predominately, may request the Finance Ministry that a percentage superior to that referred be determined.

With the introduction of Article 33-A of the EBF, the Ministerial Order nr. 555/2002, of July 4th, is revoked. ∎

As concerns the terms of the Extension of Decree-Law nr. 404/90 of December 21st

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Decree-Law nr. 404/90, of December 21st, (law that contemplates the exemption of Municipal Tax over the Transfer of Real Estate Property "Imposto Municipal sobre as Transmissões Onerosas de Imóveis – IMT", of Stamp Duty and of fees and other legal fees due for the realisation of company concentrations and cooperations) was extended until December 31st, 2006 by Law nr. 55-B/2004, even if with significant amendments.

These amendments consist in the revocation of the regime of tacit approval of the request of granting of these benefits and in the exclusion of the objective scope of the IMT and Stamp Duty exemption in respect to the following acts: (i) the preliminary and complementary acts of business concentration; (ii) the incorporation of companies, (iii) the operations that involve companies in an individual name; (iv) the transfer of real estate property destined for housing; (v) the operations that involve entities that do not undertake the same economic activity or related activities; and (vi) the incorporation or division of participation portfolios of isolated assets.

As concerns the revocation of the tacit approval, the doubts that were raised – especially the form for the counting of the time limit, the uncertainty as to the verification of the suspensive facts to which the same deadline was subject to and the non-existence of an efficient manner to obtain the acknowledgement of its verification – renders it, in the majority of cases, as an inoperative regime.

The exclusion of the preliminary or complementary acts of business concentration was certainly motivated by the latitude that those concepts were interpreted, permitting, namely, the inclusion under the scope of the application of the referred Decree-Law nr. 404/90 of operations that are not subject to the concept of acts of concentration. In fact, it was sufficient that those acts were preceded or consequent to the so-called acts of concentration to, in practice, be qualified as preliminary or complementary acts of those acts of concentration and, in conformity, susceptible of coming under the framing of the exemptions concerned (in those of IMT and of Stamp Duty). Notwithstanding, as appears to result from the referred Decree-Law nr. 404/90, the exemption of the fees and other legal charges for the conclusion of those preliminary and complementary acts were maintained.

The remaining amendments introduced seem to follow, *grosso modo*, the purpose of avoiding the abusive use of the regime established in the referred law – as is deduced, mainly, from the amendments described above in sub-paragraphs (iv), (v) and (vi) of nr, 1.

In conclusion, the main amendments introduced by Law nr. 55-B/2004, of December 30th, in Decree-Law nr. 404/90, of December 21st, ending the abuses committed in the past, are a mirror of the signs of our time: in the impossibility of combating excessive or abusive behaviours, the law should be changed. ∎

Bank secrecy

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The derogation of bank secrecy presently set forth in article 63 – B of the General Tax Law has undergone several amendments in the sense of extending the situations whereby the Tax Administration may have direct access to banking information and documents of the taxpayer.

The amendments fall over the procedure formalities for the derogation of bank secrecy and over the guarantees of the taxpayer, whenever one of the following situations are verified: a) evidence of a tax crime, b) the existence of facts indicating that statements made by the taxpayer are false.

In these situations, the new wording of article 63-B foresees the release of prior authorisation of the tax-payer, the release of preliminary hearing of the taxpayer and the elimination of the suspensive effect of the legal appeal of the decision for derogation of bank secrecy. ■

Amendment to the Time-limits of Expiry and Statutes of Limitation

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The State Budget for 2005 amends the regime of expiry of the right for settlement of taxes, as well as the statutes of limitation of the tax credits foreseen, respectively, in articles 45 and 48 of the General Tax Law ("Lei Geral Tributária" - LGT).

Under the terms of the new wording of article 45 of the LGT, the initial term of the time-limit of expiry of the right for settlement of taxes over income subject to definitive tax deduction at the source (such as, income paid to non-residents and income subject to liberatory rates, when the aggregation option does not exist) is shifted from the time of verification of the tax fact to the start of the following fiscal year to that of the occurrence of that event.

In practice, this means that, in accordance with the previous wording of the referred rule, for example, as concerns a payment made on 20.02.2004 to a non-resident company in Portugal, the Tax Administration may exercise its right of collection of tax (IRS / IRC) until 20.02.2008. In light of the new wording of the article and as concerns an income of an equal nature paid on 20.02.2005, the Tax Administration may collect tax until 01.01.2010, this is, 4 years after the start of the fiscal year following that of payment of the income.

As concern the time-limit of the statutes of limitation, an amendment to the initial term of the time-limit was also verified. In accordance with the new wording of article 48 of the LGT, in the case of credits of tax collected over income subject to definitive deduction at the source, as well as VAT credits, the course of the time-limit of the statute of limitation shall commence not at the time of verification of the tax fact but at the start of the civil year following that of the verification of that event. Therefore, for example, the tax credit referent to the payment made in 20.02.2004 to a non-resident entity in Portugal shall expire, in accordance with the prior wording of article 48 of the LGT, on 20.02.2012. In accordance with the new wording, the tax credit of the same nature, referent to a payment made on 20.02.2005 shall expire on 01.01.2014.

We consider that these legislative amendments go against the general principles of law in what concerns expiry and statutes of limitation: the authorative rights expire and the credit rights reach the statute of limitation with the term of the time-limit legally determined, which initial term will coincide with the start of the possibility of legal exercise of the referred rights by its titleholders. Therefore, the extinctive time-limit of the rights (whether of expiry or of statute of limitation) should commence simultaneously and in parallel with the legal possibility of exercise of the corresponding rights by its titleholder.

The truth is that, in what concern income subject to tax deduction at the source, as well as in the case of VAT, the Tax Administration may, immediately after verification of the taxable fact, proceed with the compulsory collection of tax. In accordance with the new wording of the referred rules, the initial term of the time-limit of expiry and statute of limitation will always be subsequent to the moment when it will be legally possible for the Tax Administration to exercise the respective rights. Therefore, the start of the course of the extinctive time-limit of the rights of the State, in this case, does not coincide with the moment when the State may legally exercise those rights.

It is verified that, after the initial effort – contemplated in the original version of the General Tax Law – of reduction of the expiry time-limit of the right of the Tax Administration to collect taxes (from 5 to 4 years), as well as the time-limit for the statute of limitation of tax credits (from 10 to 8 years), the subsequent amendment to the provisions that rule these aspects are in the sense of, in practice, extending again the duration of the referred time-limits.

In our understanding, this is an acknowledgement, through a legislative means, of the incapacity of the State, whilst the holder of the right to claim and collect tax, to exercise those rights within the time-limits in force.

Concurrently, the directly proportional restriction of the taxpayers guarantees are verified in the perspective of right to stability and safety in the legal-tax relations. ■

Bank accounts exclusively destined for a business activity

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Article 40, nr. 3, of Law nr. 55-B/2004, of December 30th, that approved the State Budget of 2005, introduced a new article 63-C to the General Tax Law, providing for compulsory specific rules for the use of bank accounts by entities that have or should have an organised accountancy.

These new rules are included in a set of measures to cut down on tax fraud and evasion and determine, in general, that the whole activity of taxable entities with an organised accountancy should be reflected in one or several bank accounts exclusively destined for the activity carried out.

The entities that are liable to IRS or IRC that have an organised accountancy are obligated to have, at least, one bank account through which payments are made and income is deposited related to the business activity carried out.

All movements related with partners' loans, loans or advances, as well as any "other movements of or in favour of the taxable entities must be made through that (those) account(s) (however, the legal precept under analysis not specifying the movements concerned).

Finally, the referred article 63-C of the General Tax Law introduces specific rules as to the form payments of invoices or equivalent documents should comply with, imposing that these be made through a means of payment that permits the identification of the respective receiver, namely nominative cheque or bank transfer – applicable to payments of an amount equal or exceeding 20 times the minimum monthly salary ((€ 7.494,00). ■

Measure in respect to Value Added Tax

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The bill of the State Budget of 2005 has introduced several legislative amendments and legislative authorisations, as concerns VAT, of which we point out the following.

A – Legislative Amendments

1. Taxpayers will be able to recover VAT incurred in certain expenses in the organisation or participation in conventions, fairs or exhibitions, provided that: (i) contracted with licensed travel agencies or hotel and restaurant establishments, (ii) are in a minimum amount of €5.000,00 per invoice and (iii) confirmedly contribute for the realisation of taxable operations. The expenses listed as deductible, in the referred cases, are expenses with transportation, business travel expenses (including road tolls), receptions (including those expenses related with the lease of real estate and its equipment), accommodation, food and catering.

Also as concerns the referred expenses, the VAT will be deductible in the proportion of 50% when resulting from the organisation of conventions, fairs, exhibitions or conferences and were directly contracted with the renderer of services or through entities legally qualified for that purpose and contribute for the realisation of taxable operations.

Finally, the VAT incurred in expenses of transportation, business travel expenses (including road tolls), accommodation, food and catering will be deductible in the proportion of 25% when resulting from the organisation of conventions, fairs, exhibitions, seminars or conferences and were directly contracted with the organising entities of the events and contribute for the realisation of taxable operations.

2. The purchaser of goods or services – provided a taxable entity listed in article 2, nr. 1 a) of the VAT Code, acting as such and even if exempt from tax – will be considered jointly responsible for the payment of tax, in the case of a simulated transaction or simulation of the price set forth in the invoice or equivalent document, even if proof is produced that all or part of the tax has been paid to the Taxable Entity who is indicated as the supplier of the goods or the renderer of the services in the invoice or equivalent document.

3. A List I is introduced, which now tax at a reduced rate of 5% (i) improvement, refurbishing, renovation, restoration, repair or maintenance works in real estate for housing, with the exception of cleaning works, maintenance of green zones and the works on real estate that covers the totality or part of the elements that constitute swimming-pools, saunas, tennis courts, golf or mini-

golf courses or similar installations; the materials incorporated are not included in this scope unless the respective value does not exceed 20% of the total value of the rendering of services; (ii) the rendering of domiciliary services to children, the elderly, drug addicts, ill or handicapped persons and (iii) all types of nappies.

4. Article 72-A is introduced in the VAT Code establishing the joint liability – in operations carried out or declared with the intention of not delivering the corresponding tax to the State – for the payment of the missing VAT of the taxable entities set forth in article 2(2)(a) of the VAT Code who intervene in any phase of the economic circuit, in operations related with these goods / services, provided that they had or should have had knowledge of those circumstances.

It is foreseen that this will only be applicable to operations to be defined by decree of the Finance Ministry and Public Administration Ministry, when operations related with activities whereby such practice occurs repeatedly are concerned.

The assumption is also established that the taxable entity has knowledge of the referred circumstances, whenever the price due by him is inferior (i) to the lowest price that would be reasonable to pay in a situation of free competition or (ii) to the price related to these goods / services in previous phases of the economic circuit.

This assumption may be refuted by showing that the practiced price, in a phase of the economic circuit, was due to circumstances that are not related with the intention of non-payment of the tax.,

B – Legislative Authorisations

5. The Government is authorised to review the regime of waiving of the VAT exemption in operations (transfer or lease) of real estate properties or parts thereof, in order to restrict the operations between taxable entities, contemplating anti-abuse rules that prevent the conclusion of transactions that involve entities with a special relationship and / or taxable entities without the right of total deduction, and that aim to prevent, reduce or delay the payment of VAT.

6. The Government is also authorised to review the payment conditions and control VAT refunds in the sense (i) to simplify and reduce the obligation of remittance of documentation or delivery of guarantees imposed on Taxable Entities who request refunds and (ii) to reformulate the time-limits for payment of refunds, the mechanisms for assessment of the respective legitimacy, the conditions of suspension of the counting compensatory interest for the control of situations of risks, namely Taxable Entities in declarative breach of other taxes and Taxable Entities who carry out exempt transactions with a right to deduction (for example, exports).

7. The Government is furthermore authorised to review article 38 of the VAT Code related to the obligation of documentation in taxable operations: (i) to define specific obligations of invoicing, documentation and registration of operations, in light of its value, of the nature of the taxpayers and of the category of the taxable operations; (ii) to restrict operations susceptible of the issuance of a document equivalent to an invoice; (iii) to define the requirements and contents of the equivalent documents, in accordance with elements required by invoices; (iv) to forbid and penalise the issuance or presentation of non-authorised sales slips or equivalent; (iv) to contemplate obligations of registration of all operations realised, independently or the issuance of the invoice or equivalent document, as well as the registration of invoices sent and received; (v) to extend the time-limits for registration of the transfers of goods and rendering of services and (iv) to consider the issuance and presentation to the client of other documents besides an invoice or equivalent document as illegal. ■

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