

OPINION

on a dissertation thesis for the award of the educational and scientific degree of DOCTOR

with candidate **Stefan Angelov Peshov**, PhD student in the doctoral program "Finance, Money Circulation, Credit and Insurance" (Finance), higher education area: 3. Social, Economic and Legal Sciences, professional field: 3.8. Economics. Under the academic supervision of **Assoc. Prof. Dr. Lyudmil Krastev PhD**, Department of Finance and Credit, D. A. Tsenov Academy of Economics – Svishtov.

Prepared by: Assoc. Prof. **Dr. Valentin Ivanov Milinov PhD**, Department of Finance and Credit, D. A. Tsenov Academy of Economics – Svishtov, academic specialty "Finance, Money Circulation, Credit and Insurance" (Finance) **Regarding:** Dissertation thesis on the topic "**PREVENTION OF TAX FRAUD IN THE TRADE OF FUELS AND PETROLEUM PRODUCTS IN BULGARIA**". The opinion is submitted in accordance with an Order of the Rector of the D. A. Tsenov Academy of Economics – Svishtov.

I. General Presentation of the Dissertation Thesis

The dissertation thesis submitted for the preparation of this opinion examines a highly relevant topic related to the optimization of European taxation and the possibilities for preventing tax fraud in the trade of fuels and petroleum products in Bulgaria.

The object of the dissertation thesis is the cases of unlawful practices in tax procedures regarding the trade of fuels and petroleum products. The subject of the study is the methods for limiting and preventing tax fraud in the sector of fuel and petroleum products trade. The research thesis defended in the dissertation is that the prevention of tax fraud in the trade of fuels and petroleum products helps reduce the share of the shadow economy and increases the collection of tax revenues from transactions involving fuels and petroleum products, which represent one of the main revenue streams in the state budget. The goal is to study and derive the instruments for preventing tax fraud in the trade of fuels and petroleum products.

The dissertation thesis has a standard structure of three chapters, developed within a volume of 167 pages with a profound academic style! The author demonstrates a good knowledge of the subject matter, as he is an employee of the National Revenue Agency (NRA), which aids him in developing this scientific research. Four publications have been presented, which are sufficient to fulfill the minimum national requirements for awarding the educational and scientific degree of "Doctor".

The PhD student Stefan Angelov Peshov has researched and correctly cited scientific literature, which includes 100 sources. This indicates that the author is well-informed regarding the subject matter of his research. To support the text of the dissertation

thesis, the necessary number of figures (12) and tables (26) are included. Four research papers related to the research topic have been published.

II. Assessment of the Form and Content of the Dissertation Thesis

The dissertation thesis represents a relevant scientific study, which is clarified by the 12 figures and 26 tables presented in the text to confirm the author's thesis and scientific conclusions. The used foreign literary sources are correctly cited.

The abstract (autoreferat) has been prepared in accordance with the requirements for volume and content, reflecting the most significant research and scientific contributions in the dissertation. The author's scientific publications are related to the topic of the dissertation.

III. Positive Aspects of the Dissertation Thesis

The dissertation thesis has its profound scientific achievements and contributions. The most significant are:

- The role and significance of indirect tax revenues as important instruments of fiscal policy in Bulgaria have been studied. In this context, the problems related to the excise policy pursued in Bulgaria remain highly topical and of specific interest to the EU, legislative and executive authorities, the financial administration, taxpayers, and consumers of excise goods.

- A critical analysis of scientific literature has been carried out in studying the tax system, which has national-economic, fiscal, and social dimensions. Regarding the national-economic dimension, it is necessary to understand the effect that changes or reforms in the tax system have on macroeconomic and microeconomic processes and on the behavior of economic operators—meaning enterprises, households, and the state—since it is the behavior of these entities that drives and, to a certain extent, determines economic development and, above all, appropriate and steady economic growth.

- Anti-fraud controls are not sufficiently effective and the problem is growing, as the contribution of fuel and petroleum product traders to financing state activities decreases, meaning the loss must be compensated by other taxpayers. Therefore, we propose the design and creation of a new, effective program for the prevention of fraud with fuels and petroleum products in Bulgaria.

- Based on the analysis of real data on excise legislation, we propose the introduction of a fuel tax within a framework of supplementary surcharges—i.e., in addition to the existing excise duties on petrol and diesel fuel imposed in all EU member states. Such a scheme would avoid additional administrative costs for creating a new tax authority in Bulgaria. Furthermore, a fuel tax could be levied on an already established and harmonized tax base.

IV. Questions on the Dissertation Thesis

I have no significant critical remarks for the author and I have one question:

How do you view the effects of the ongoing harmonization in European tax legislation and prevention measures as opportunities to support the fight against tax fraud in the trade of fuels and petroleum products in Bulgaria?

V. Summary Assessment of the Dissertation Thesis and Conclusion

Based on the positive opinion I have presented regarding the scientific research of PhD student **Peshov** on the topic "**PREVENTION OF TAX FRAUD IN THE TRADE OF FUELS AND PETROLEUM PRODUCTS IN BULGARIA**", I confirm that it possesses its relevant scientific qualities.

On this basis, I present my positive assessment to the academic jury and confidently vote **FOR** awarding the educational and scientific degree "Doctor" in the academic specialty "Finance, Money Circulation, Credit and Insurance" (Finance) to the PhD student Stefan Angelov Peshov, in accordance with the Development of Academic Staff Act and the Regulations for its application.

May 30, 2026

Prepared the opinion:.....

(Assoc. Prof. Dr. Valentin Milinov PhD)