

To  
The members of the Scientific Jury  
D. A. Tsenov Academy of Economics  
Finance and Credit Department

### STANDPOINT

of a member of the scientific jury, determined by Order No. 307/ 9.04.2026.  
of the Rector of D. A. Tsenov Academy of Economics – Svishtov  
on dissertation for awarding educational and scientific degree "Doctor" (in Economics)

**Author of the standpoint:** Assoc. Prof. Vanya Dencheva Tsonkova, PhD, Department of Finance and Accounting, St. Cyril and St. Methodius University of Veliko Tarnovo, Professional field: 3.8. Economics (Finance, Money Circulation, Credit and Insurance)

**Author of the dissertation:** Diman Hristov Karanfilov, PhD student, d030222225, doctoral programme „Finance, Money Circulation, Credit and Insurance (Finance)“

**Dissertation topic:** Improvement of Fiscal Techniques in VAT Taxation in Bulgaria and Romania

**Scientific supervisor:** Prof. Dr. Stoyan Prodanov

#### **I. General presentation of the dissertation work**

##### ***1. Subject***

As the object of the dissertation, the PhD student defines “*the value added tax systems in Bulgaria and Romania*”, and as the subject – “*the specific fiscal techniques, procedures and control mechanisms, the improvement of which leads to a reduction in VAT fraud and increases tax revenues in the central budgets of Bulgaria and Romania*”.

The aim of the dissertation is “*to analyze the fiscal techniques for VAT in the two neighbors and members of the EU: Bulgaria and Romania*”, and the research thesis is related to “*proving the potential for improving fiscal techniques in VAT taxation in Bulgaria and Romania, based on European harmonization, national trends and mutual exchange of goods, capital and good practices for prevention against tax fraud*”.

##### ***2. Volume***

The dissertation is 192 pages long, of which 177 pages are the main text, and the rest include the cited sources, references, and a declaration of originality.

##### ***3. Structure***

The dissertation consists of an introduction, an exposition in five chapters, and a conclusion.

The **introduction** motivates the significance and relevance of the topic under consideration, formulates the object, subject, aim and objectives of the study, the leading thesis, and presents the empirical basis, methodology and theoretical foundations.

**Chapter one** has an introductory theoretical and methodological character and examines the main concepts related to the nature, principles and administration of VAT. It addresses the European regulatory framework, certain problems associated with the application of the tax, and the need to improve control mechanisms.

**Chapter two** is dedicated to the Bulgarian VAT system, sequentially presenting the regulatory and institutional framework, the main procedures for registration, declaration, payment, refund and control of the tax. The dynamics of VAT revenues, the main challenges facing the tax administration, as

well as the relationship between gross value added and budget revenues from VAT in Bulgaria for the period 2015 - 2024 are examined using descriptive, correlation and regression analysis.

**Chapter Three** focuses on the VAT system in Romania, its regulatory and institutional framework, the applicable tax rates and the main administration and control procedures. Special attention is paid to technological solutions and administrative measures aimed at electronic invoicing, control of risky operations and limiting tax fraud.

**Chapter Four** compares individual elements of the VAT systems in Bulgaria and Romania – regulatory framework, tax rates, registration regimes, administration and control procedures. On this basis, recommendations are formulated for improving the Bulgarian system, mainly related to electronic invoicing, risk analysis, control of fictitious companies and strengthening international cooperation.

**Chapter Five** focuses on the risks of VAT fraud in intra-community supplies (ICS) between Bulgaria and Romania and is directly linked to the hypothesis put forward by the author that ICS can be a source of significant losses for the tax authorities in the form of foregone VAT revenues. It systematizes the main schemes of abuse, including those involving missing traders, buffer companies and brokers, and also examines the possibilities for optimizing administrative cooperation and information exchange between the revenue administrations of the two countries.

The **conclusion** summarizes the main results of the study and the author emphasizes that the Romanian experience with technological solutions in VAT taxation can be useful for improving the Bulgarian system. The main differences between the VAT taxation systems in Bulgaria and Romania are also outlined, as well as specific recommendations related to electronic invoicing, split payment, risk analysis through artificial intelligence and international administrative cooperation in combating VAT fraud.

#### **4. Bibliography**

The PhD student has used 91 sources in Bulgarian and English, including academic literature in the fields of public finance and taxation, official documents, legal acts, as well as statistical and analytical information from national and international institutions. A significant presence of publications by the same authors and research teams can be observed, which to some extent limits the diversity of the presented scientific perspectives. In addition, some of the cited sources are of a more general nature in relation to the main subject matter of the dissertation. Throughout the exposition, the author frequently refers to textbooks, including older editions, when presenting the current regulatory framework, instead of relying directly on primary legal sources.

#### **5. Appendices to the document**

The dissertation does not contain any appendices, but the main text includes 3 tables, as well as 13 graphs and diagrams related to the analysis of VAT revenues, the mechanisms of VAT and the variants of tax fraud in them. They help to illustrate the research and present the researched problems more clearly.

## **II. Assessment of the form and content of the dissertation**

### ***1. Assessment of the relevance and development of the researched scientific problem***

The relevance of the topic is determined by the primary importance of VAT revenues for the fiscal system, as well as by the risks associated with fictitious transactions and cross-border tax fraud schemes in the context of digitalisation and increasing demands on tax administration.

The issues related to VAT administration, increasing the effectiveness of tax control, and reducing the so-called VAT gap within the European Union have been widely examined in the specialised financial literature. At the same time, the original contribution of the author consists in the comparative analysis of VAT taxation in Bulgaria and Romania, the possibilities for implementing selected

good practices from the Romanian experience into the Bulgarian tax system, as well as the emphasis placed on analysing the risks related to intra-community supplies (ICS) between the two countries as a potential source of significant budget losses.

### ***2. Opinion on the language, volume and toolbox of the dissertation work***

The dissertation employs appropriate financial and legal terminology, while the exposition is focused primarily on the practical aspects of the issue under consideration.

In certain parts of the dissertation, descriptiveness, repetition and fragmentation of the exposition can be observed, creating the impression of an artificial increase in volume accompanied by limited analytical interpretation and empirical argumentation. Also unusual is the spelling out of years and numerical values in words, which falls outside generally accepted standards.

The methodological toolkit used includes comparative analysis, regulatory analysis, statistical data analysis, a case-study approach, and an examination of practices related to VAT administration and control in Bulgaria and Romania. Overall, the selected methods correspond to the subject matter and objectives of the research and allow for the formulation of practically oriented conclusions and recommendations.

### ***3. Opinion as to how well the author's thesis abstract accurately and completely reflects the work***

The abstract contains the mandatory elements: a general description of the dissertation; a presentation of its main content; directions for future research; a statement of the scientific and applied contributions of the dissertation; a list of the PhD student's publications; information regarding participation in scientific forums; a statement of compliance with the national requirements under the Regulations for the Implementation of the Law on the Development of Academic Staff in the Republic of Bulgaria; and a declaration of originality of the dissertation.

In presenting the main content, however, the author focuses primarily on the conclusions, findings and results of the individual chapters, while the internal logical consistency of the exposition remains in the background. Nevertheless, the abstract provides a sufficiently clear overview of the subject of the research, the main problematic areas, the comparative analysis conducted between Bulgaria and Romania, and the formulated recommendations for improving fiscal techniques in VAT taxation.

The PhD student has presented three independent publications related to the topic of the dissertation, including one study, one article and one conference paper, thereby fulfilling the minimum national requirements for the acquisition of the educational and scientific degree "doctor".

## **III. Scientific and scientific-applied contributions of the dissertation work**

The contributions formulated by the author reflect the main results and the practical orientation of the dissertation. In my view, the nature of the contributions follows the author's research style and approach, and they may be attributed predominantly to the field of applied scientific contributions.

1. A comparative analysis of the VAT systems in Bulgaria and Romania has been conducted, systematising the main differences and specific features related to the administration and control of the tax.
2. Technological solutions applied in Romanian practice have been analysed, and the possibilities for adapting selected good practices within the Bulgarian tax system have been examined.
3. The risks associated with intra-community supplies (ICS) between Bulgaria and Romania as a prerequisite for VAT fraud and budget losses have been investigated.

4. Practically oriented recommendations have been formulated for improving fiscal control, electronic exchange of information, and administrative cooperation between the two countries.

#### **IV. Critical notes and questions on dissertation work**

The presented dissertation addresses a topical and practically significant issue and contains useful conclusions and recommendations. Alongside its positive aspects, academic objectivity requires that the following critical remarks and recommendations also be made:

1. Use of insufficiently up-to-date literature, statistical data, and in some places also regulatory framework (for example, repealed VAT law – p. 45), which to a certain extent limits the relevance of some conclusions and assessments. When presenting the current regulation, primary (normative) sources should be used, and not to refer to academic literature, including older editions.
2. The included economic analysis of VAT revenues in our country and in Romania is more of a journalistic nature, as it represents a citation of other sources, without tabular and/or graphical presentation of data, without methodology and actual research.
3. The econometric analysis of VAT revenues in Bulgaria is an attempt to have a more serious scientific toolkit, but its research value remains relatively limited, since the established dependencies (with gross value added) are to a significant extent theoretically predetermined and expected in advance.

#### **Question for the PhD student:**

Given the emphasis on Romanian technological solutions in VAT administration and control, what do you think are *the main practical and institutional obstacles to the introduction of mandatory electronic invoicing and a split payment mechanism in Bulgaria and to what extent does the Bulgarian tax administration have the necessary administrative and technological capacity for such a transformation? Considering the negative Bulgarian experience with the so-called VAT invoices in the past, to what extent do you think the split payment mechanism would be applicable in Bulgaria and how could the problems related to liquidity and administrative burden for businesses be avoided?*

#### **V. Summary evaluation of the dissertation work and conclusion**

The presented dissertation complies with the requirements of the national legislation and the internal regulations of D. A. Tsenov Academy of Economics. Through this work, the author demonstrates good theoretical preparation in the field of public finance and taxation, as well as an understanding of the practical aspects of VAT administration and control. The research problem is both topical and practically significant, while the formulated conclusions and recommendations possess an applied orientation. The ideas and results of the conducted research have been disseminated through scientific publications related to the subject matter of the dissertation.

All this gives me grounds to give a positive evaluation of the dissertation and to propose that the respected members of the Scientific Jury **vote in favour of awarding the educational and scientific degree “doctor”** in the doctoral programme “Finance, Money Circulation, Credit and Insurance (Finance)” to the PhD student Diman Hristov Karanfilov.

17 May 2026  
Veliko Tarnovo

Member of the Scientific Jury:  
Assoc. Prof. Vanya Tsonkova, PhD