



СРПСКА АКАДЕМИЈА
НАУКА И УМЕТНОСТИ

Огранак у Нишу



ГРАД ПИРОТ



UGOVORNA OKRUŽNA
PRIVREDNA
KOMORA
PIROT



FAKULTET ZA
MENADŽMENT
ZAJEČAR



II Међународна научно-стручна конференција
РЕГИОНАЛНИ РАЗВОЈ И ПРЕКОГРАНИЧНА САРАДЊА
Пирот, Република Србија

УЛОГА ДРЖАВЕ У РАЗВОЈУ СЛОБОДНИХ ЗОНА

- др Драган Ч. Костић ванредни професор
- Александар Симоновић
- Универзитет Мегатренд Београд, Факултет за менаџмент Зајечар, Република Србија dragan.kostic3@gmail.com
- Слободна зона Пирот, Србија, aleksandar.simonovic@freezonepirot.com

15. децембар 2018. године

Апстракт

Слободне зоне се свуда у свету развијају уз снажну помоћ и ослонац државе.

Коришћењем туђег капитала, држава даје значајне погодности и бенефиције, као што су изузеће од ПДВ, пореза, такси , царина, итд, одричући се при томе прихода (кога у том тренутку и нема) у сврху привлачења директних инвестиција, повећања уписаности радне снаге и примене нових технологија.

Апстракт

Како је подршка државних органа развоју пројекта слободних зона од кључног значаја, у раду су анализирани главни економски и административни разлози постојања и функционисања слободних зона, посебно са аспекта државе и предузећа корисника зоне

Апстракт

- *Да слободне зоне омогућавају корисницима уштеде у различитим областима пословања (царине - неплаћање или одложено плаћање, таксе, порези,);*
- *да је концентрација услуга на једном месту - логистички центар за , царинске, транспортне и услуге складиштења, претовара, дораде, итд.;*
- *да успешно повећавају уписаност кроз организацију производње (случај Слободне зоне Пирот);*
- *да су ефикасно средство за привлачења инвестиција за потребе националног и регионалног развоја;*
- *да су погодан инструмент за имплементацију технолошки напредних производњи итд.*

Апстракт

Предложени су институционални услови које треба испунити да би се остварила мисија слободних зона и обезбедили најповољнији услови за пословање стварањем простора убрзаног развоја и запошљавања.

Постоји потреба за синхронизацијом, допуном, усаглашењем и доношењем нових институционалних решења, и то нарочито у областима законске регулативе која регулише области пореза, рада и радних односа, царинских прописа и државних помоћи.

Proposal for attraction of investors

Germany is preparing a plan that could give tax breaks and create special economic zones in countries like Greece.

Six-Point Growth Plan: Berlin Proposes European Special Economic Zones

With Europe beginning to look for alternatives to its exclusive focus on austerity, the German government has developed a six-point plan to foster economic growth in Europe, SPIEGEL has learned. Included in the proposal is the creation of special economic zones in struggling euro-zone countries.

From SPIEGEL ONLINE ►

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DPA

Dark clouds gather over the Acropolis in Athens: Germany is preparing a plan that could give tax breaks and create special economic zones in countries like Greece.



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UGOVORNA OKRUŽNA
POSREDOVANJE
POSREDOVANJE



FAKULTET ZA
MENADŽMENT
POSREDOVANJE



NASE SLOBODNE ZONE GUBE KONKURENTNOST

Међународна научно-стручна конференција
ОПШТИ НАСТАВНИЦИ
Пирот, Република Србија

1. Nedovoljna poreska oslobađanja

2. Usklađivanje zakonske regulative sa EU

15. децембар 2018. године



ГРАД ПИРОТ



UGOVORNA OKRUŽNA
PRIVREDNA
OMOGUĆAVANJE
PIROT



FAKULTET ZA
MENADŽMENT
ZALČAR



NAŠE SLOBODNE ZONE GUBE KONKURENTNOST

Међународна научно-стручна конференција
ЕКОНОМСКИ РАЗВОЈ И ПРЕКОГРАНИЧНА САРАДЊА

Пирот, Република Србија

1. Nedovoljna poreska oslobođanja

15. децембар 2018. године



**SERBIAN
FREE
ZONES**

1. Nedovoljna poreska oslobađanja

ГРАД ПИРОТ

PIROT



FAKULTET
ZA PRIMENJENU
EKOLOGIJU

UNIVERZITET
SINGIDUNUM



Међународна научно-стручна конференција
ОДРАЗЛОЖENJE I RAZVOJ I PREKOGRANIČNA SARADNJA
Пирот, Република Србија

CUSTOM DUTY			
PRODUCTS	RATE OUTSIDE THE ZONE	RATE IN THE ZONE	
Raw materials	0% - 15%	0%	
Equipment	5% - 20%	0%	
Consumer goods	15% - 30%	0%	
Agricultural and food products	25% - 60%	0%	

15. децембар 2018. године



SERBIAN FREE ZONES

1. Nedovoljna poreska oslobađanja

Међународна научно-стручна конференција
ОДРЖАЊЕ ПЛОДНОГ РАЗВОЈА И ПРЕКОГРАНИЧНА САРАДЊА
Пирот, Република Србија

TAX DUTY			
TAX	RATE OUTSIDE THE ZONE	RATE IN THE ZONE	
Value Added Tax	18%	0%	
Accise tax	5% - 62%	0%	
Income tax	10%	0% for 10 years	

15. децембар 2018. године



1. Nedovoljna poreska oslobađanja

ГРАД ПИРОТ

PIROT

ЗАЈЕЧАН

LAJAN

TET
LITAN

Univerzitet Singidunum
FUTURA
Fakultet za primenu ekologije

Међународна научно-стручна конференција
ОПШТИ РАЗВОЈ И ПРЕКОГРАНИЧНА САРАДЊА

	TURSKA
BROJ ZONA	21 slobodna zona www.dtm.gov.tr
Porez na dobit u sl zonama	Oslobođenje u potpunosti (0%) do kraja poreskog perioda u kojem Turska postane punopravni član EU.

15. децембар 2018. године



1. Nedovoljna poreska oslobađanja

ГРАД ПИРОТ

PIROT



FUTURA



Међународна научно-стручна конференција
ЛИНИ РАЗВОЈ И ПРЕКОГРАНИЧНА САРАДЊА
Пирот, Република Србија

RADNI ODNOSI

Zarada radnika zaposlenih kod korisnika zona koji izvoze najmanje 85% vrednosti robe proizvedene u slobodanim zonama **su izuzete od poreza na prihod**. Savet ministara može da smanjuju ovu stopu na 50%.

15. децембар 2018. године

Turska

Огранак у Ниш

WORLD FREE ZONES

УНИВЕРЗИТЕТ СИНГИДУМ
НАУКА И УМЕТНОСТИ

ГРАД ПИРОТ

УГОВОРНА ОКРУЖНА
ПРИВРЕДНА

ФАКУЛТЕТ ЗА
МЕНАДЖМЕНТ

УНИВЕРЗИТЕТ
METROPOLITAN

Univerzitet Singidunum

INVEST IN TURKEY
THE REPUBLIC OF TURKEY PRIME MINISTRY
INVESTMENT SUPPORT AND PROMOTION AGENCY

EN English Search



Turkey at a GlanceInvestment GuideSectorsBenchmark TurkeyInteractive MapSuccess StoriesInfo Center

Investment Guide > Investors' Guide > Special Investment Zones

10 Reasons to Invest in Turkey

Investors' Guide

> Prior to Arrival in Turkey

> Establishing a Business in Turkey

> Transferring Assets

> Cost of Doing Business in Turkey

> Financing a Business

> Incentives

> Employees and Social Security

> Taxes

> Special Investment Zones

> Demography and Labor Force

> Regulatory and Supervisory Authorities

> Infrastructure and Logistics

> Macroeconomic Indicators

> FDI in Turkey

> Foreign Trade

> Investment Legislation



Contact ISPAT

Special Investment Zones

There are three types of special investment zones in Turkey:

1. Technology Development Zones - Technoparks

Technology Development Zones (TDZs*) are areas designed to support R&D activities and attract investments in high technology fields.

There are 59 TDZs of which 44 are operational and 15 have been approved and are currently under construction.

Advantages of TDZs

- Revenues derived from software development and R&D activities are exempt from income and corporate taxes until December 31, 2023.
- Sales of application software products developed in TDZs are exempt from VAT until December 31, 2023. Examples include software for systems management, data management, business applications, different business sectors, the Internet, mobile phones and military command control.
- Salaries of R&D and support personnel employed in the zone are exempt from all taxes until December 31, 2023. The number of the support personnel covered by the exemption shall not exceed 10 percent of the number of the R&D personnel.
- Investments for the production of the technological product obtained as a result of the R&D projects conducted in the zone may be made in the TDZ, if deemed suitable by the operator company and allowed by the Ministry.
- 50 percent of the employer's share of the social security premium will be paid by the government for 5 years until 31.12.2024.

2. Organized Industrial Zones

Organized Industrial Zones (OIZs*) are designed to allow companies to operate within an investor-friendly

WORLD FREE ZONES

ЕГ

3. Free Zones

Free zones are special sites considered to be outside the customs area, although they are within the political borders of the country. These zones are designed to increase the number of export-focused investments. Legal and administrative regulations in the commercial, financial, and economic fields that are applicable within the customs area are either not implemented or partially implemented in the free zones.

There are 20 FZs* in Turkey (19 are operational) located close to the EU and Middle Eastern markets adjacent to major Turkish ports on the Mediterranean, Aegean, and Black Seas, with easy access to international trade routes.

Advantages of FZs

- ▶ 100% exemption from customs duties and other assorted duties.
- ▶ 100% exemption from corporate income tax for manufacturing companies.
- ▶ 100% exemption from value added tax (VAT) and special consumption tax.
- ▶ 100% exemption from income tax on employees' salaries (for companies that export at least 85% of the FOB value of the goods they produce in the free zones).
- ▶ Goods can remain in free zones for an unlimited period.
- ▶ Companies are free to transfer profits from free zones to abroad as well as to Turkey, without restrictions.

*Please visit the Interactive Map for the locations of special investment zones in Turkey.



ГРАД ПИРОТ



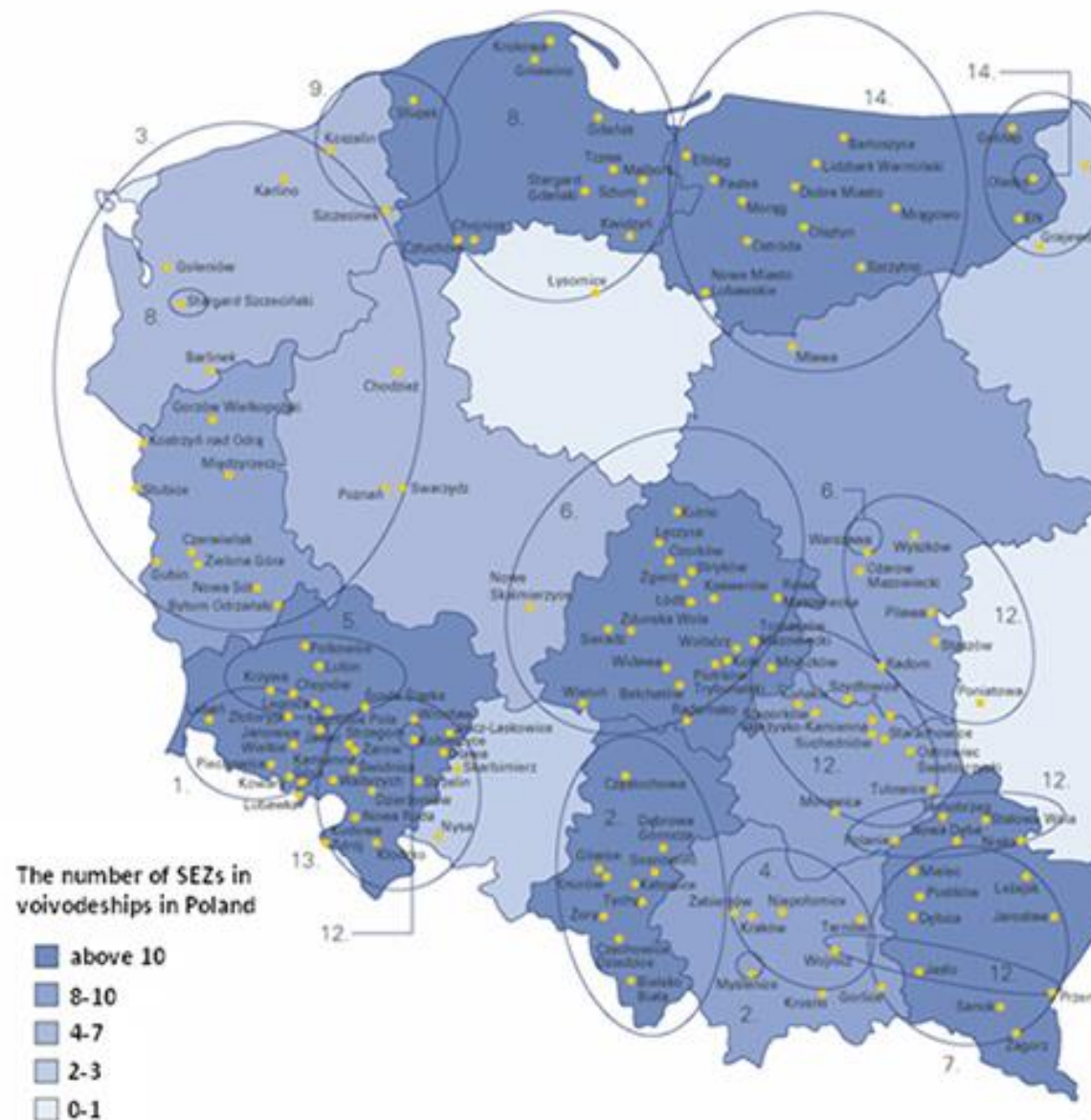
Kaunas FEZ:
534 Ha



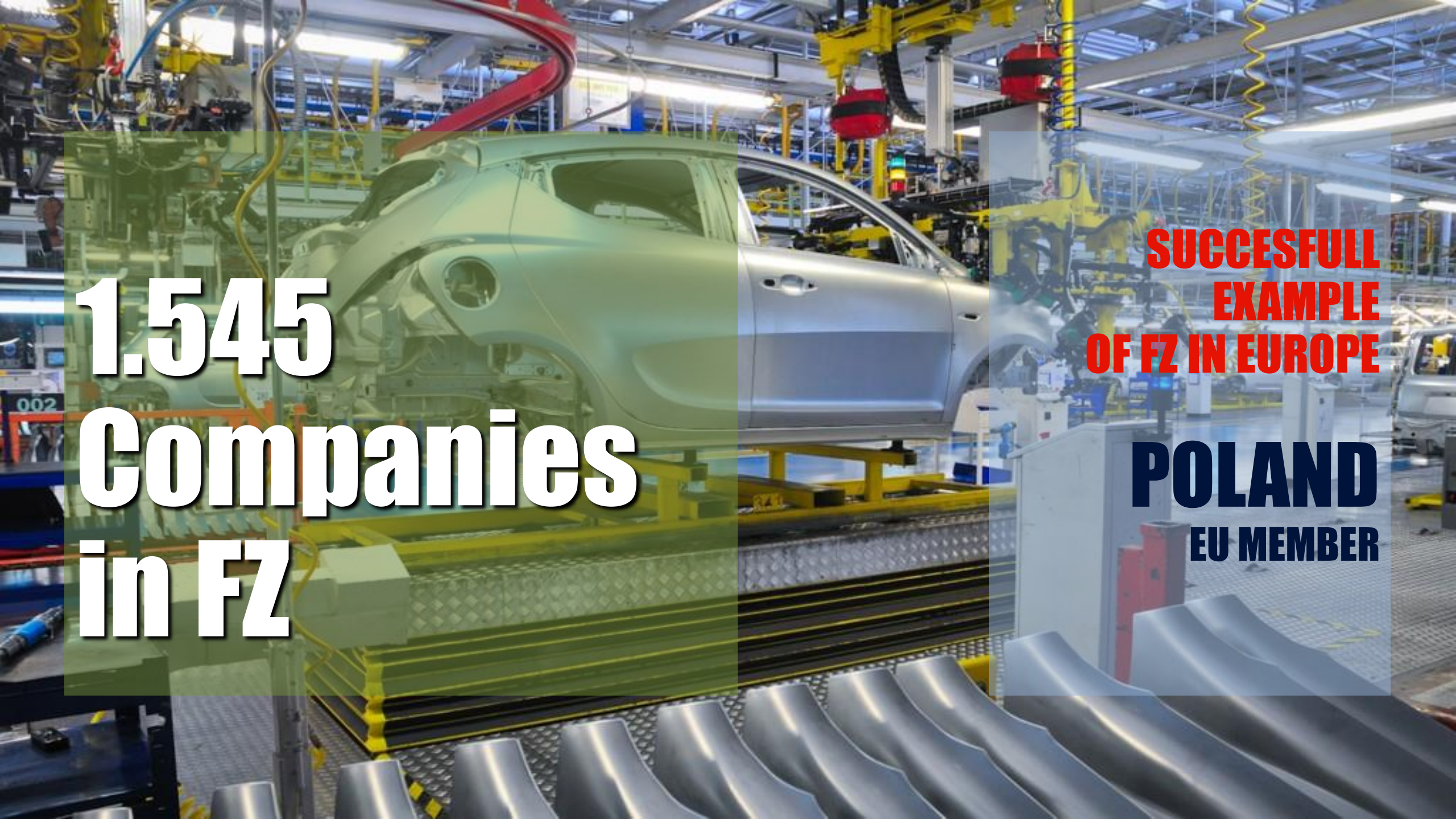
Tax	General	FEZ
Income tax	15 %	0 % (first 6 years) 50% of the tax rate (subsequent 10 years)
Property tax	1 %	0 %
Dividend tax	15 %	0 %

15. децембар 2018. године

Polish model



14 Free zones in Poland



**1.545
Companies
in FZ**

**SUCCESSFUL
EXAMPLE
OF FZ IN EUROPE**

**POLAND
EU MEMBER**



**186.000
Workers**

**SUCCESSFUL
EXAMPLE
OF FZ IN EUROPE**

POLAND
EU MEMBER



**20,4 Billion
Eur
Invested**

**SUCCESSFUL
EXAMPLE
OF FZ IN EUROPE**

**POLAND
EU MEMBER**

Exemptions :

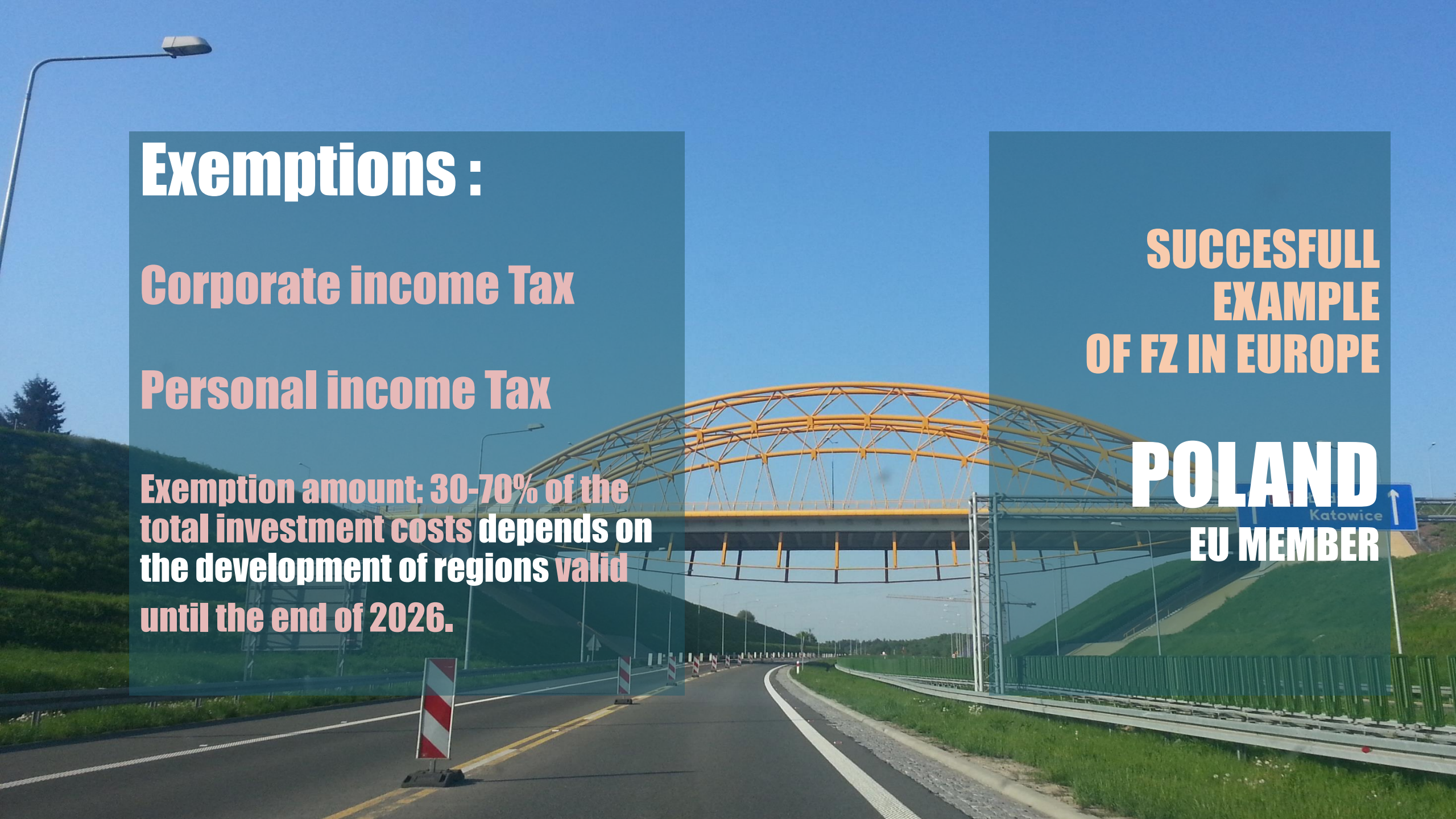
Corporate income Tax

Personal income Tax

Exemption amount: 30-70% of the total investment costs depends on the development of regions valid until the end of 2026.

SUCCESSFUL
EXAMPLE
OF FZ IN EUROPE

POLAND
EU MEMBER





ГРАД ПИРОТ



UGOVORNA OKRUŽNA
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ZAJEČAR



Међународна научно-стручна конференција
ОПШТИ РАЗВОЈ И ПРЕКОГРАНИЧНА САРАДЊА

1. Poreska oslobođanja u okruženju

15. децембар 2018. године

**FREE
ZONES**

II Међународна научно-стручна конференција И

TAX DUTIES		
TAX	RATE OUTSIDE THE ZONE	RATE IN THE ZONE
Value Added Tax	18%	0%
Corporate Income Tax	10%	0% for 10 years
Personal Income Tax	10%	0% for 10 years

FREE ZONES

II Међуна
ЦИОНАЛН

U period od 10 godina data umanjenja:

- Porez na dobit – 100%
- Porez na zarade – 100%

Ne plaćaju se

- Lokalne e takse
- Naknade za korišćenje zemljišta
- Građevinske dozvole
- Konekcije na infrastrukturu (gas, voda, kanalizacija)



FREE ZONES

Advantages of FZs

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- ▶ 100% exemption from corporate income tax for manufacturing companies.
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FREE ZONES

Olakšice imaju ROK!

REPUBLIC OF TURKEY
MINISTRY OF ECONOMY

COUNTRIES LEGISLATION INVESTMENT FREE ZONES FDI

HOME > FREE ZONES > Advantages of the Turkish Free Zones

ADVANTAGES OF THE TURKISH FREE ZONES

1. Opportunity to Benefit from Tax Advantages for Manufacturer Users

- ▶ Until the end of the taxation year including the date Turkey becomes a full member of the European Union, the earnings of the manufacturer users, generated through the sales of the goods they produced in the free zones, are exempted from the income or corporate taxes.
- ▶ The wages of the workers employed by the users that export at least 85 percent of the FOB value of the goods they produce in the free zones are exempted from income tax. The Council of Ministers can reduce this rate to 50 percent.
- ▶ The transactions and arranged documents related to the activities carried out in the zones by the manufacturer users are exempt from stamp duties and fees.

The free zone users that obtained "operating license" other than "production" before 06/02/2004, the income or corporate tax exemption continues during the validity period of the Operating License.

The free zone users that obtained operating license other than production after 06/02/2004 do not enjoy income or corporate tax exemption.

15. децембар 2018. године



FREE
ZONES

Investment Incentives

What are tax incentives in Montenegro?

- **Tax credits** – The amount of tax due can be reduced by 25% of the amount invested in fixed assets for the respective tax period. This reduction cannot exceed 30% of the total tax liability.
- **Incentives for non-developed areas (Northern part of the country)** - New founded companies, in the area of production, are corporate tax-free during the first three years of operation.
- **Carrying Loss** - Losses resulting from business relations, excluding those resulting in capital gains and losses, may be transferred forward to offset profit generated in future calculations periods, but not exceeding five years.
- **Investments in securities** – If profit from capital investment is used for purchase of new securities, such profit is not taxable under to condition that it is reinvested within 12 months from its arising. Profit from sale of securities held by a taxpayer for more than two years in his portfolio is exempt from taxation.

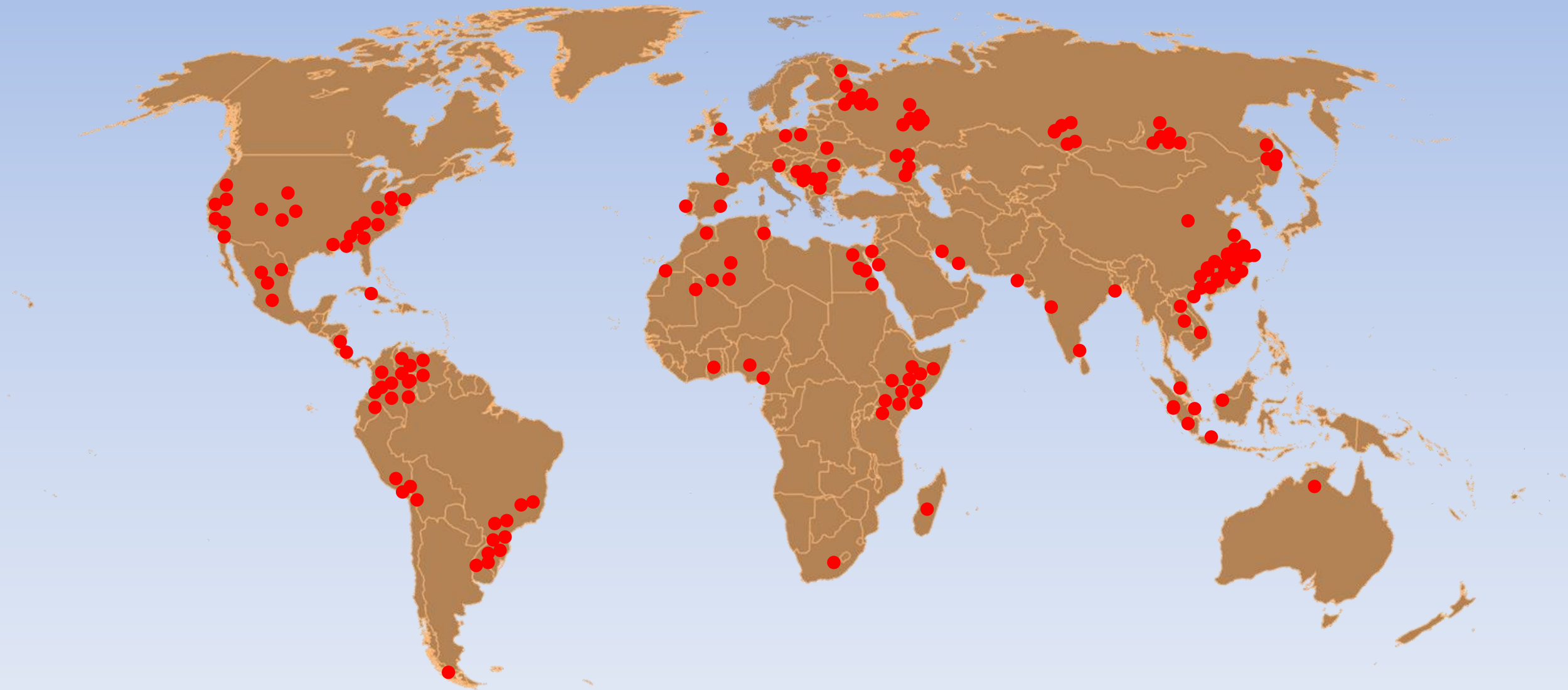
**FREE
ZONES**

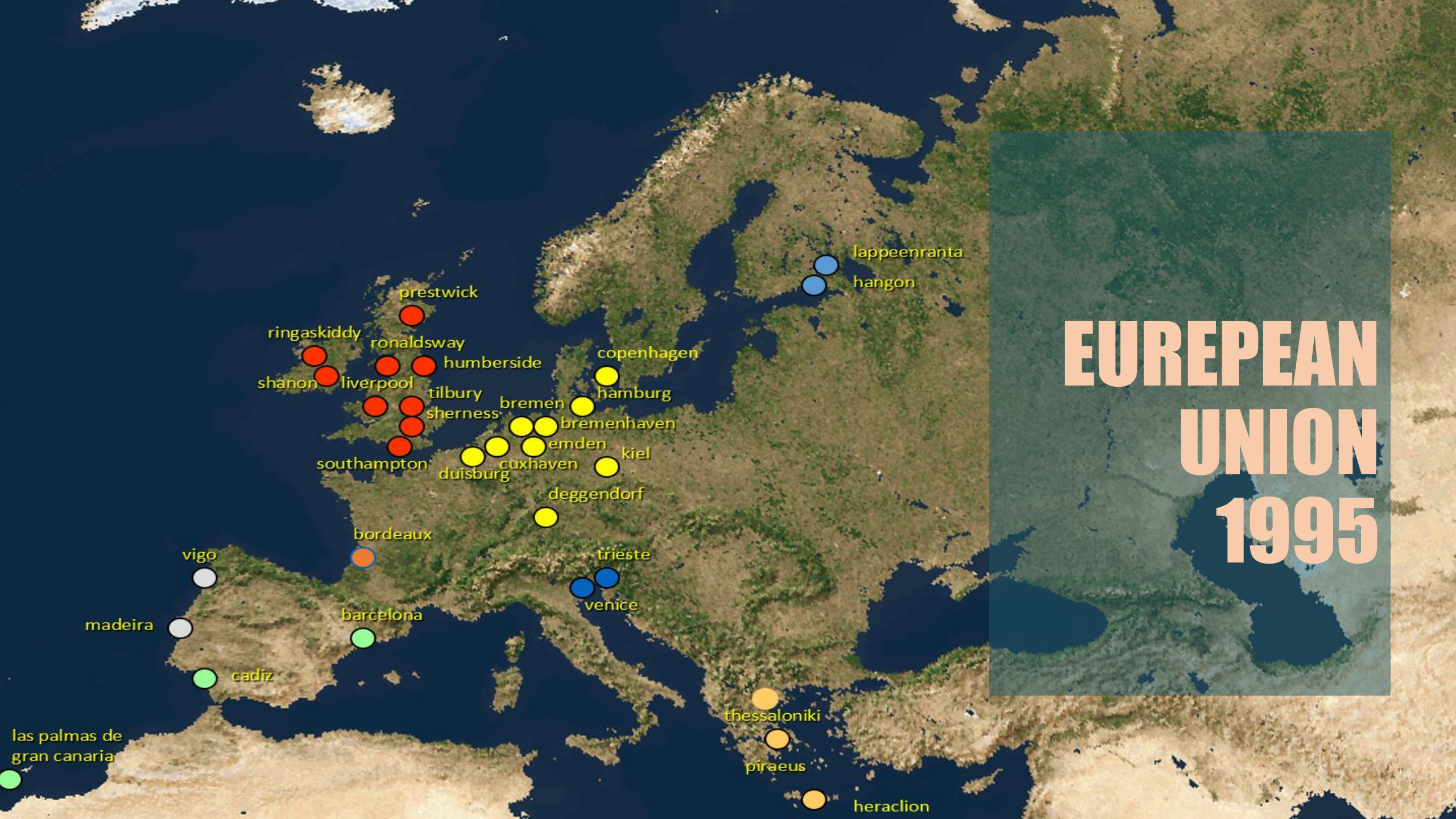
II Ме
ЕГИОН

**Фирма која извози више од 30%
производње не плаћа порез на добит у
тој години**

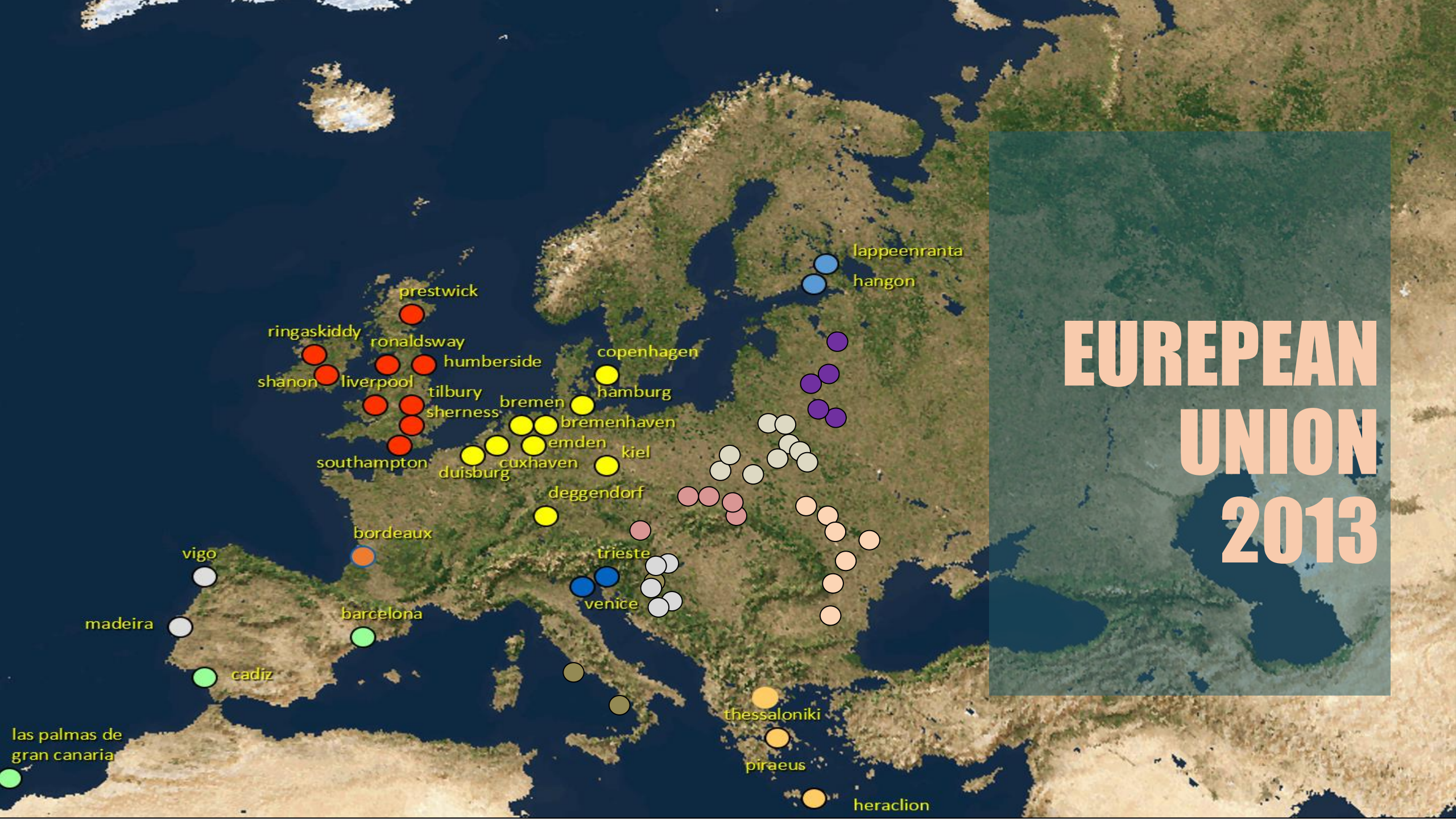
**Фирма која запосли више од 30
радника на неодређено има умањење
пореза на зараде и доприноса**

Global Free Zones in the World



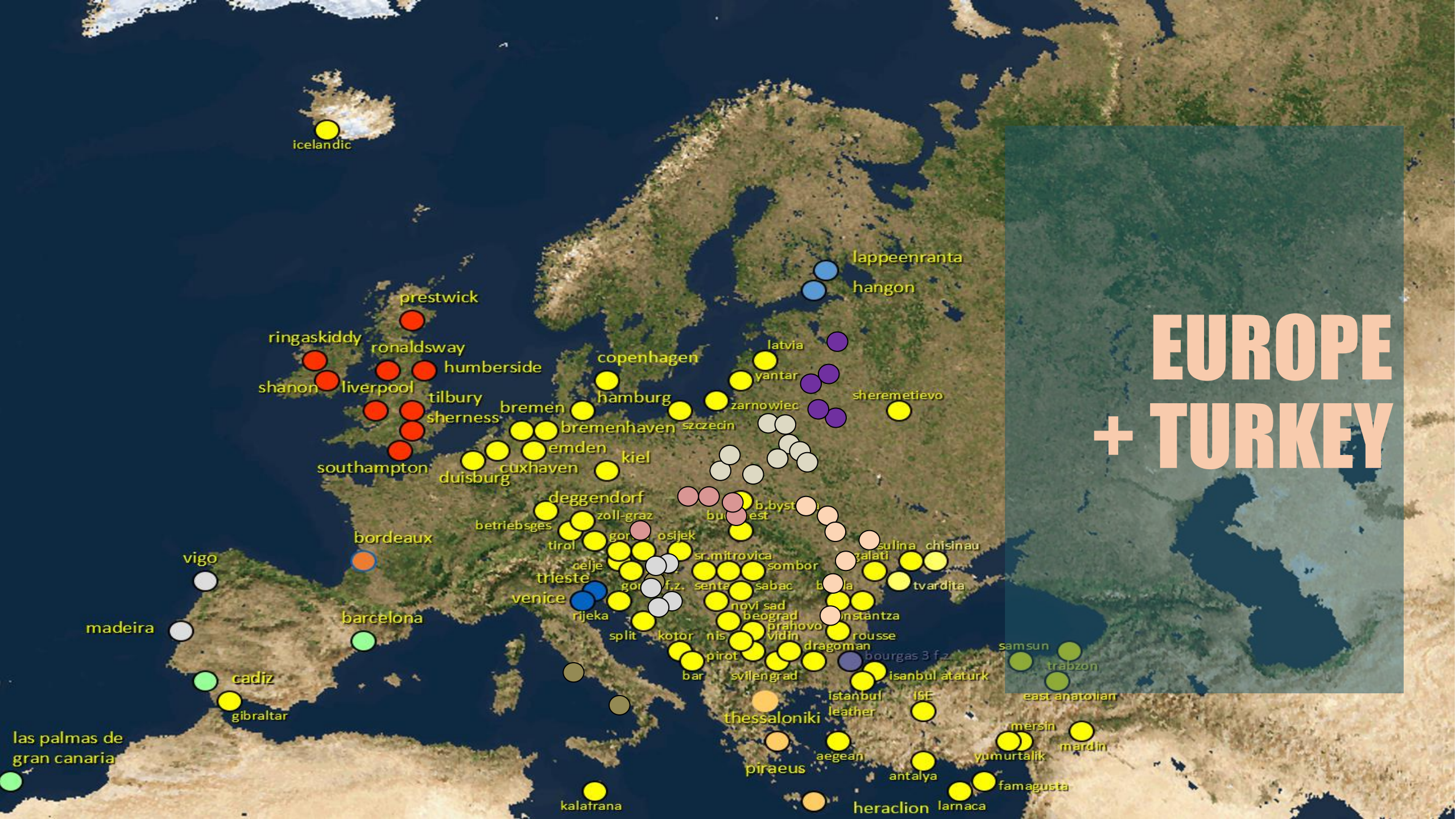


**EUROPEAN
UNION
1995**



EUROPEAN UNION 2013

- las palmas de gran canaria
- madeira
- cadiz
- barcelona
- vigo
- bordeaux
- southampton
- duisburg
- cuxhaven
- emden
- kiel
- deggendorf
- venice
- trieste
- thessaloniki
- piraeus
- heraclion
- lappeenranta
- hango
- prestwick
- ringaskiddy
- ronaldsway
- humberside
- copenhagen
- hamburg
- bremen
- bremenhaven
- tilbury
- sherness
- liverpool
- shanon



EUROPE + TURKEY

icelandic

lappeenranta
hangon

prestwick
ringaskiddy
ronaldsway
humberside
shanon
liverpool
tilbury
sherness
southampton

copenhagen

latvia

sheremetievo

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bremen
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zarnowiec

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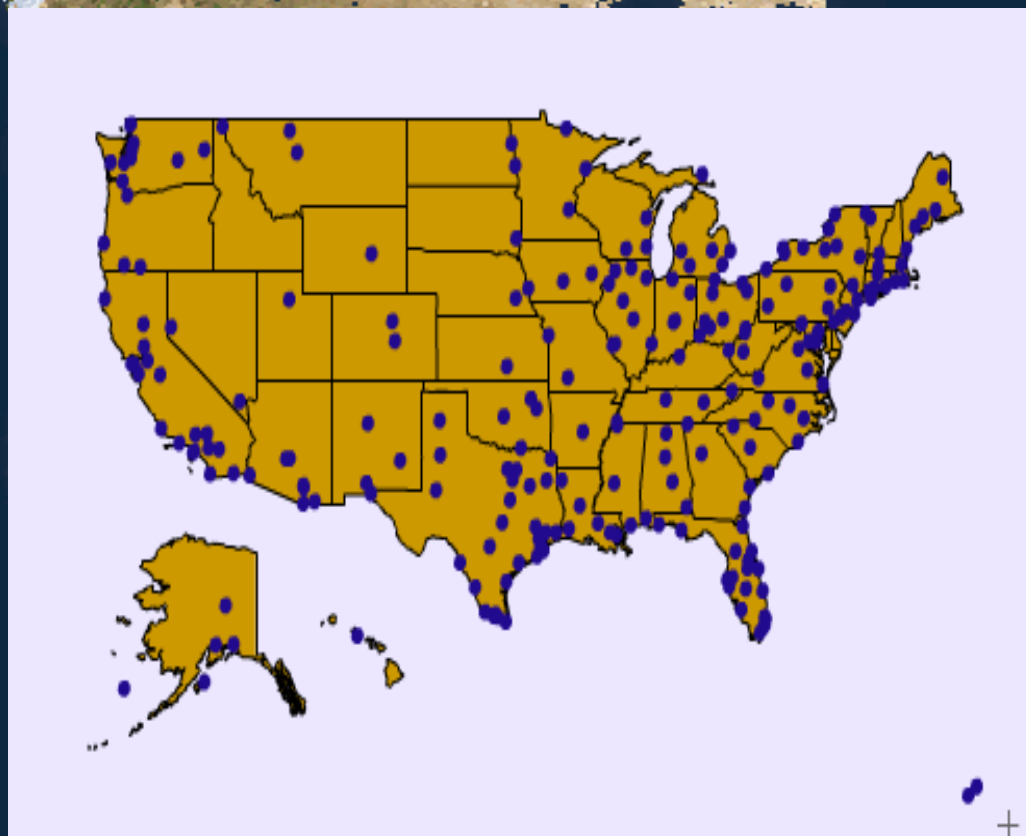
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USA

MEXICO

DISTRIBUTION OF THE 107 FREE
ZONES IN MEXICO

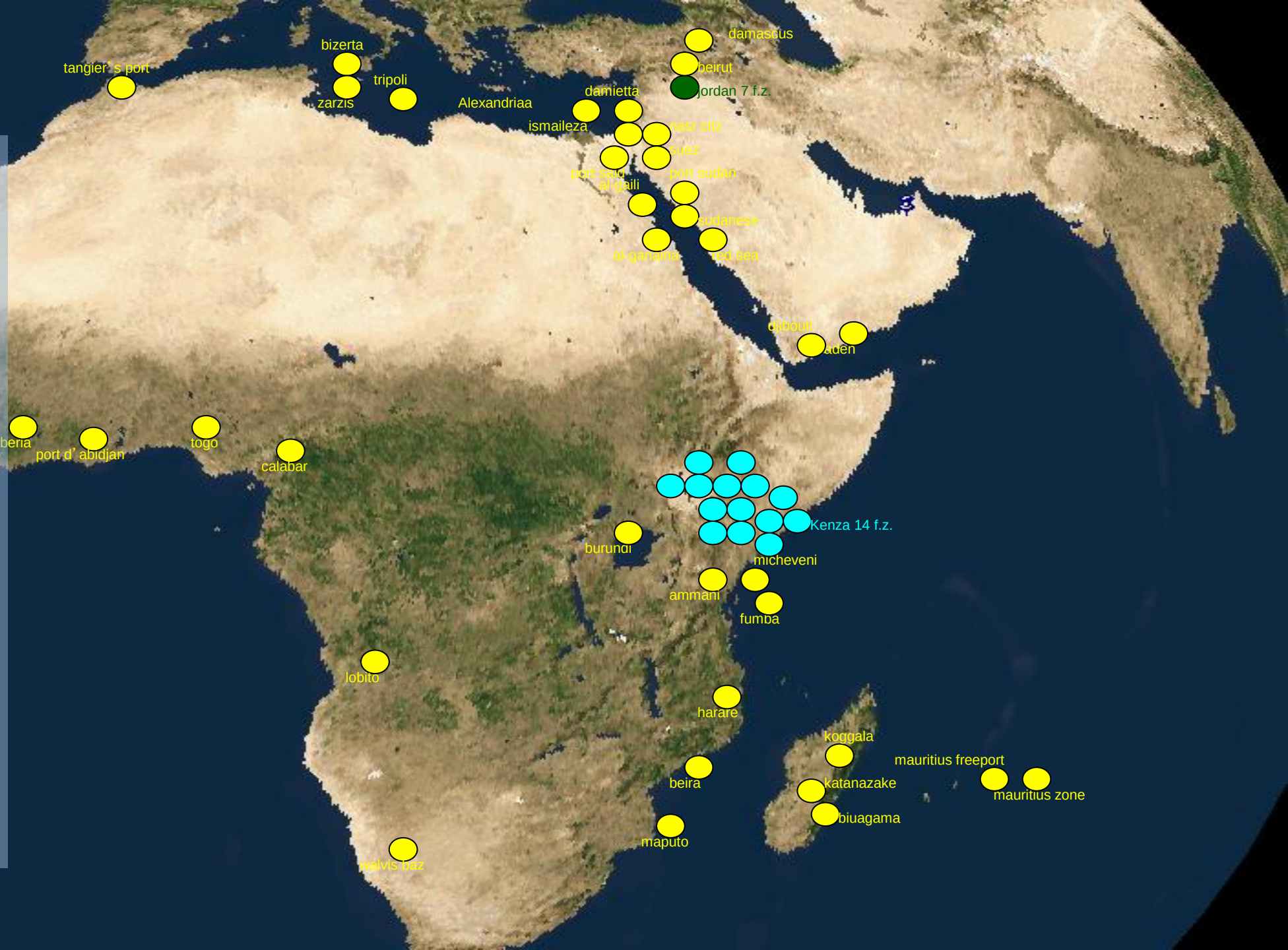


MEXICO 107 F.Z.

el waju
berroa marel
cientuegos



SOUTH AMERICA



ASIA



AUSTRALIA OCEANIA

The background of the image is a stylized representation of the Russian flag, featuring three horizontal stripes of white, blue, and red. The stripes are tilted diagonally from the bottom-left to the top-right. A semi-transparent grey rectangular box is positioned on the left side of the image, containing the text.

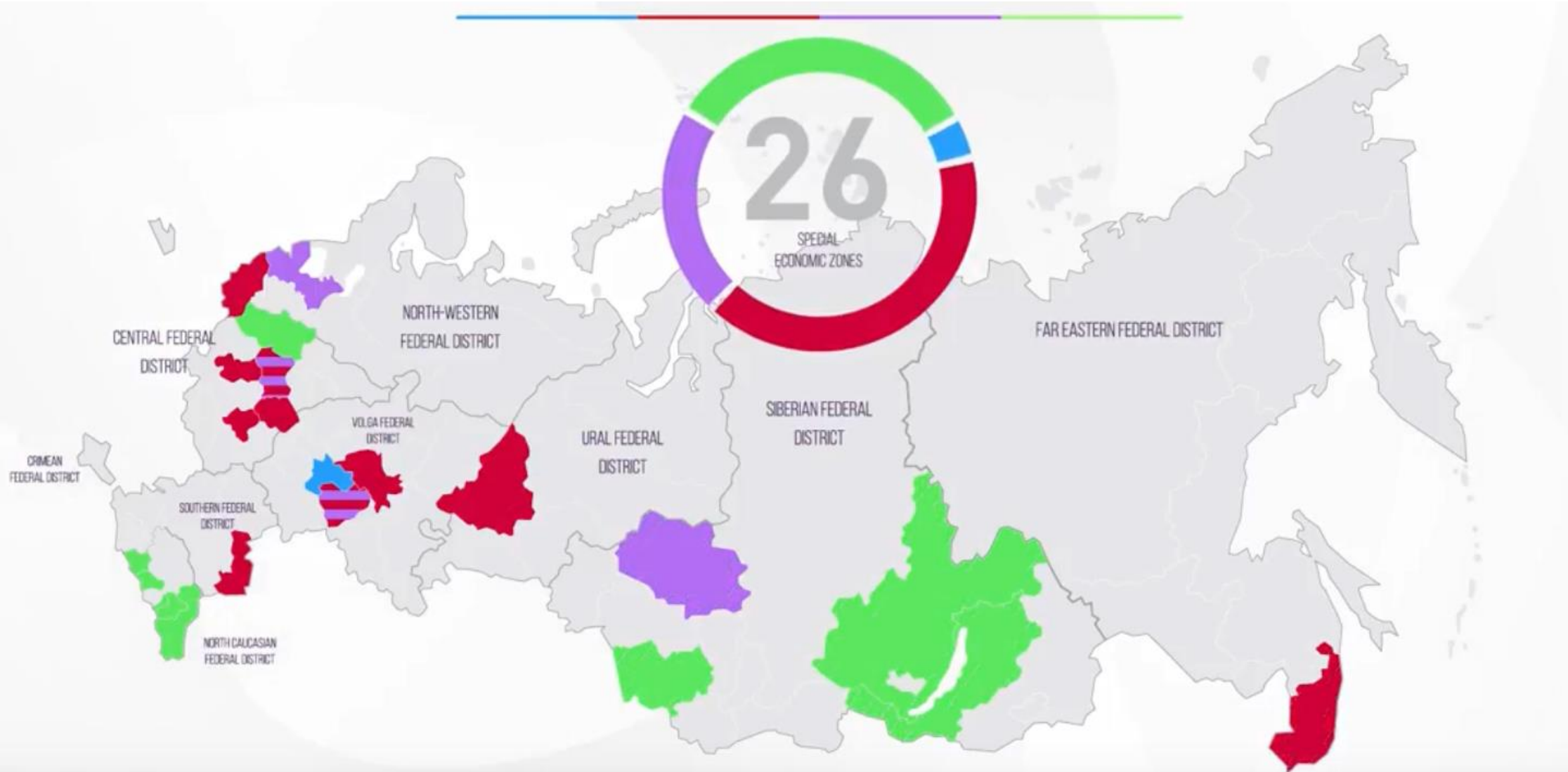
**Free Zones
of**

**Russian
Federation**

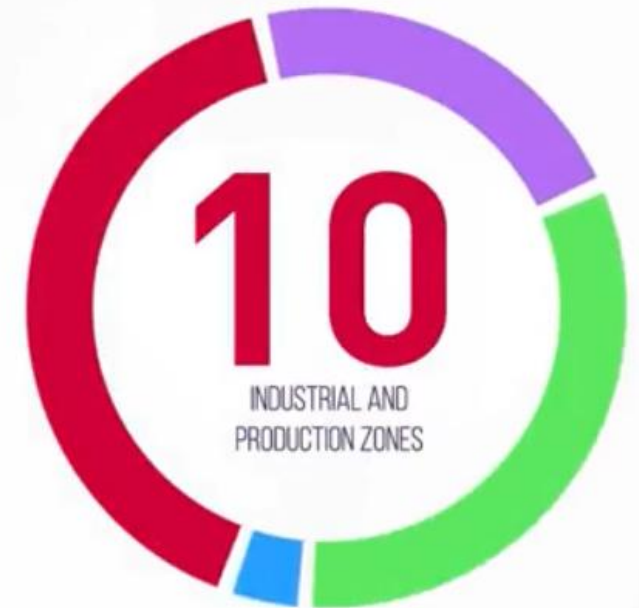
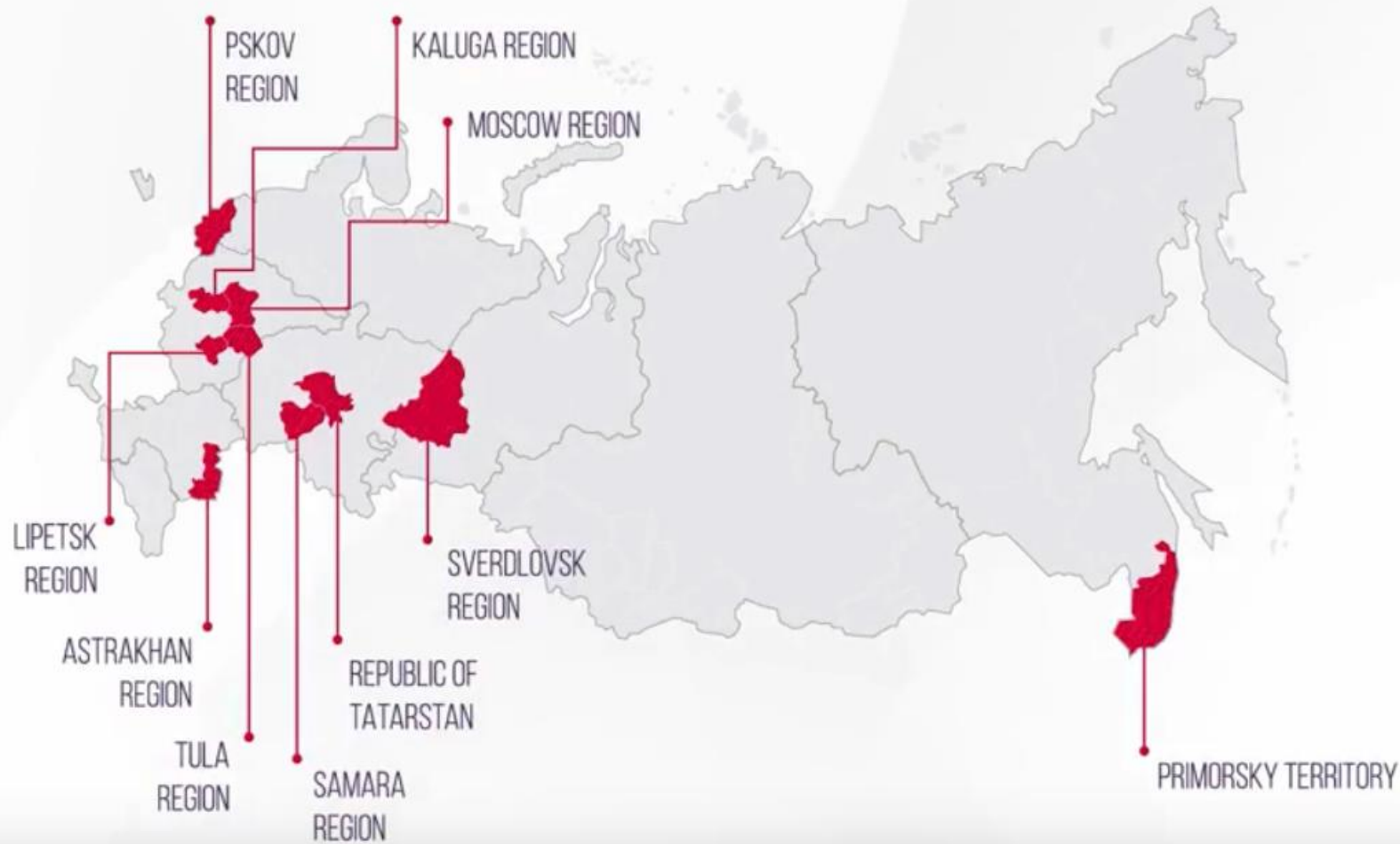
TYPE OF FREE ZONES OF RUSSIAN FEDERATION



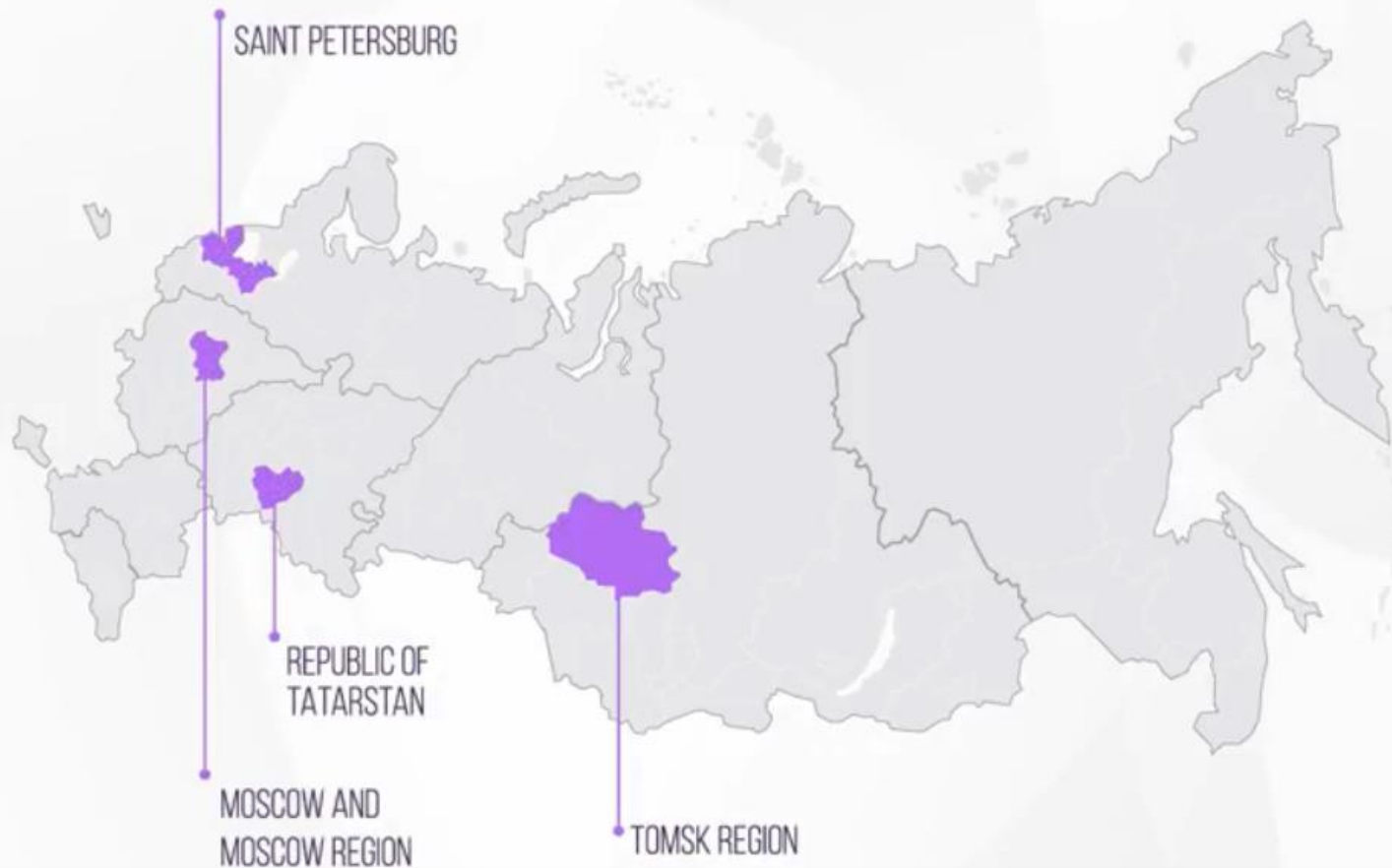
LOCATIONS OF FREE ZONES OF RUSSIAN FEDERATION



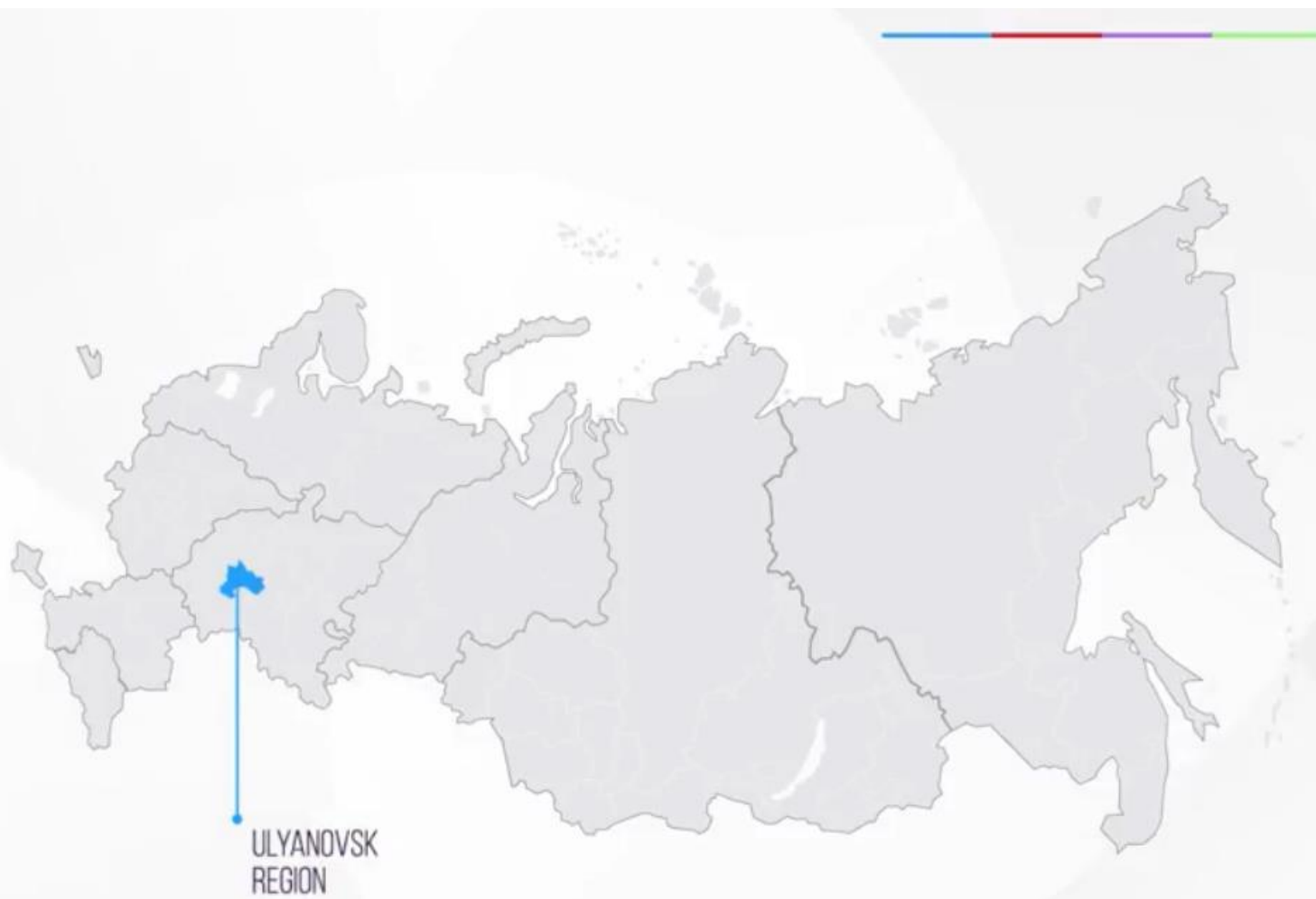
INDUSTRIAL AND PRODUCTION ZONES



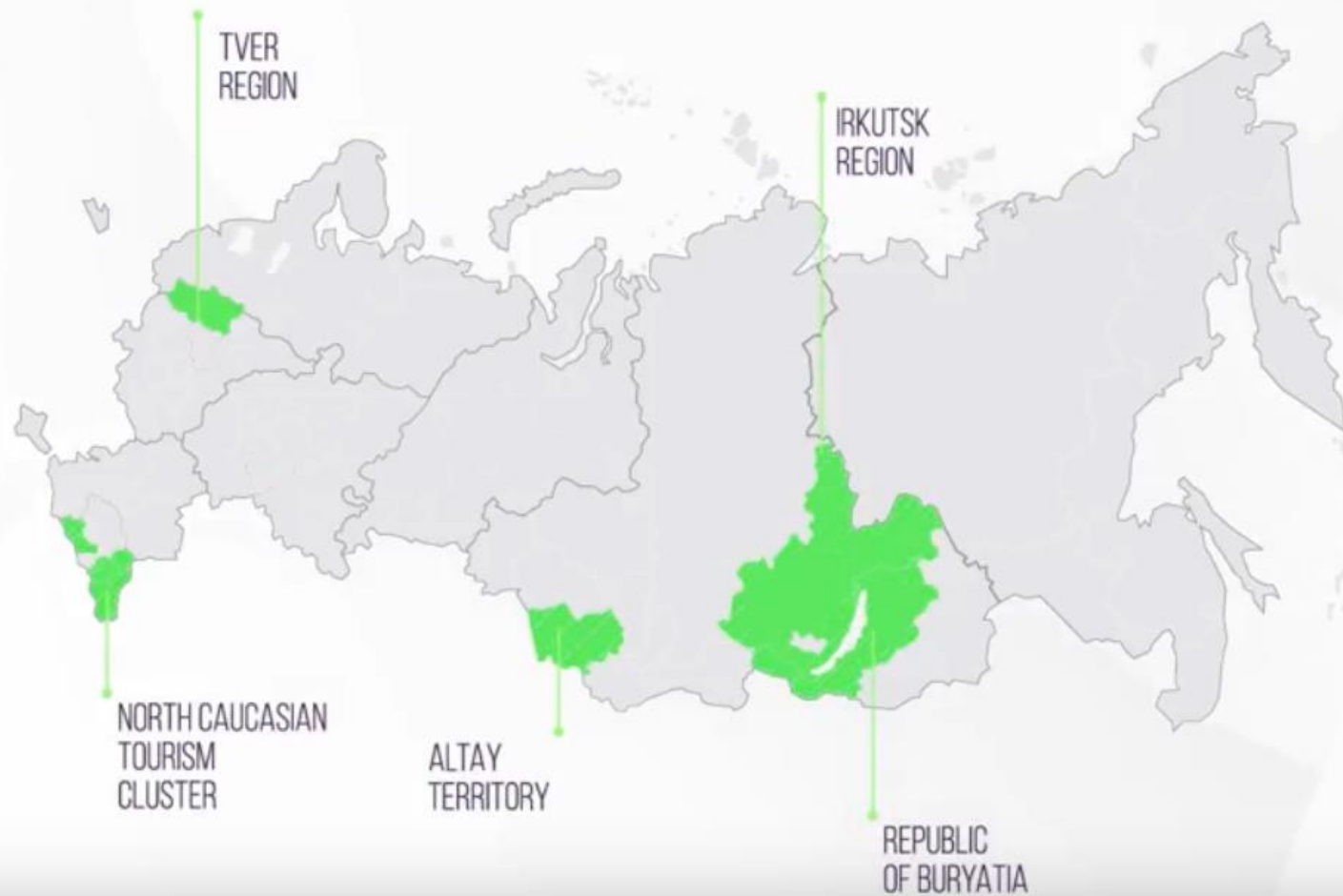
TECHNOLOGY AND INNOVATION ZONES



PORT ZONE



TOURIST AND RECREATIONAL ZONES



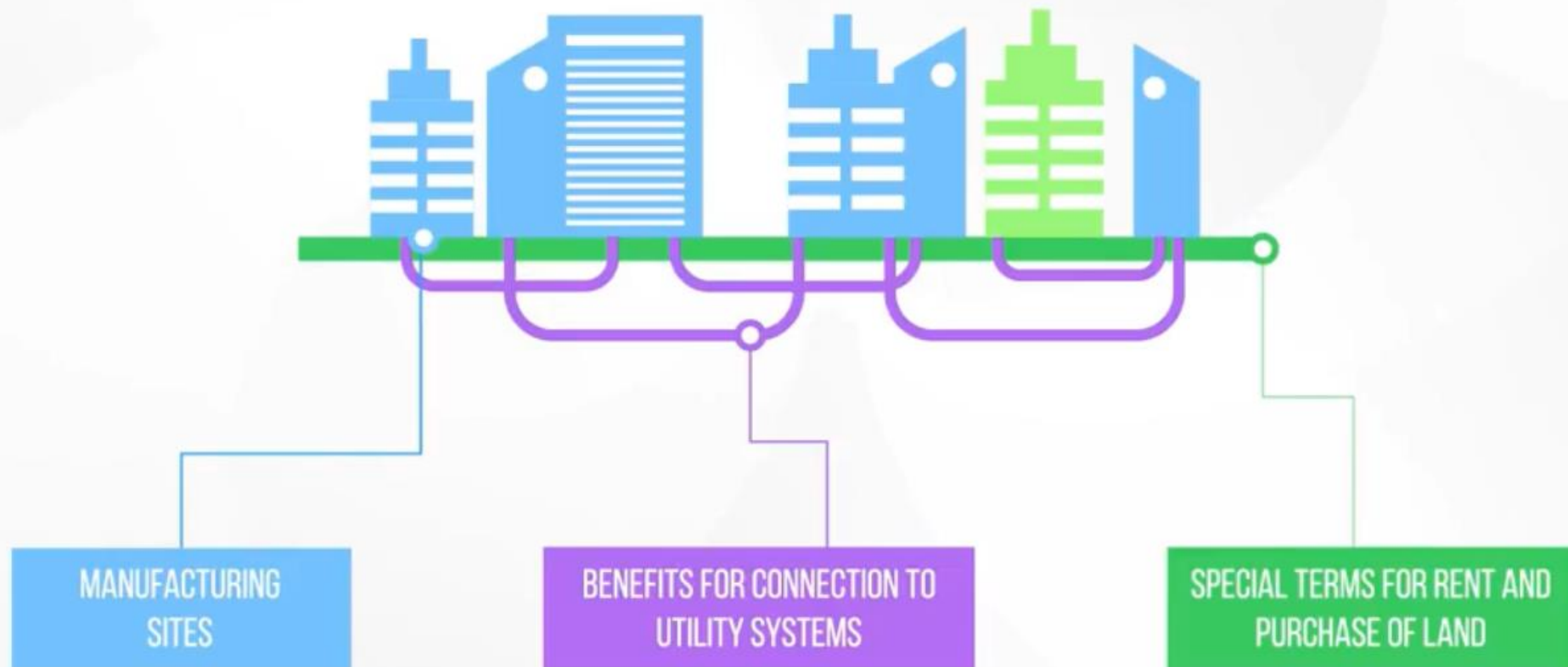
RESIDENTS OF SEZ OF RUSSIAN FEDERATION



ADVANTAGES FOR INVESTORS



ADVANTAGES FOR INVESTORS



TAX BENEFITS - RUSSIAN FEDERATION

TOTAL REDUCTION OF COSTS UP TO 30% FROM INITIAL INVESTMENTS

	INCOME TAX	PROPERTY TAX	LAND TAX	TRANSPORT TAX	SOCIAL TAXES	COST OF LAND
RUSSIA	20%	2,2%	1,5%	0.1–3.5 EURO/HP	30%	100% MARKET
SEZ	0–15,5%	0%	0%	0	14% 21% 28%	PRICE FOR LAND LEASE ≤2% OF CADASTRAL PRICE*
VALIDITY TERM	VALIDITY PERIOD OF SEZ	10 YEARS	5 OR 10 YEARS	10 YEARS	UNTIL 01.01.2018 UNTIL 01.01.2019 UNTIL 01.01.2020	VALIDITY PERIOD OF SEZ

* (FOR THE LAND IN STATE PROPERTY)

FREE CUSTOMS ZONE

0%

- CUSTOMS DUTIES FOR IMPORT OF EQUIPMENT, COMPONENTS AND MATERIALS INTO THE SEZ
- VAT FOR IMPORT OF EQUIPMENT, COMPONENTS AND MATERIALS INTO THE SEZ
- CUSTOMS DUTIES FOR FINISHED GOODS EXPORTED OUTSIDE THE EURASIAN CUSTOMS UNION (EACU) (RUSSIA, BELARUS, KAZAKHSTAN, ARMENIA, KYRGYZSTAN)



RUSSIAN GOODS

FOREIGN GOODS

OVER
550
EXPERIENCED
INVESTORS

OVER
100
FOREIGN
INVESTORS

30
COUNTRIES

OVER
11
BILLION US DOLLARS
OF COMMITTED INVESTMENTS

ABOUT
6
BILLION US DOLLARS -
RESIDENTS' PRODUCTION
VOLUME

OVER
21 000
JOBS


700
USA MLN \$


250
GERMANY MLN \$


100
FRANCE MLN \$


100
SWITZERLAND MLN \$

500
MLN \$ JAPAN

300
MLN \$ CHINA

400
MLN \$ TURKEY

100
MLN \$ ITALY



FREE ZONES IN EU





FREE ZONES IN EUROPEAN UNION

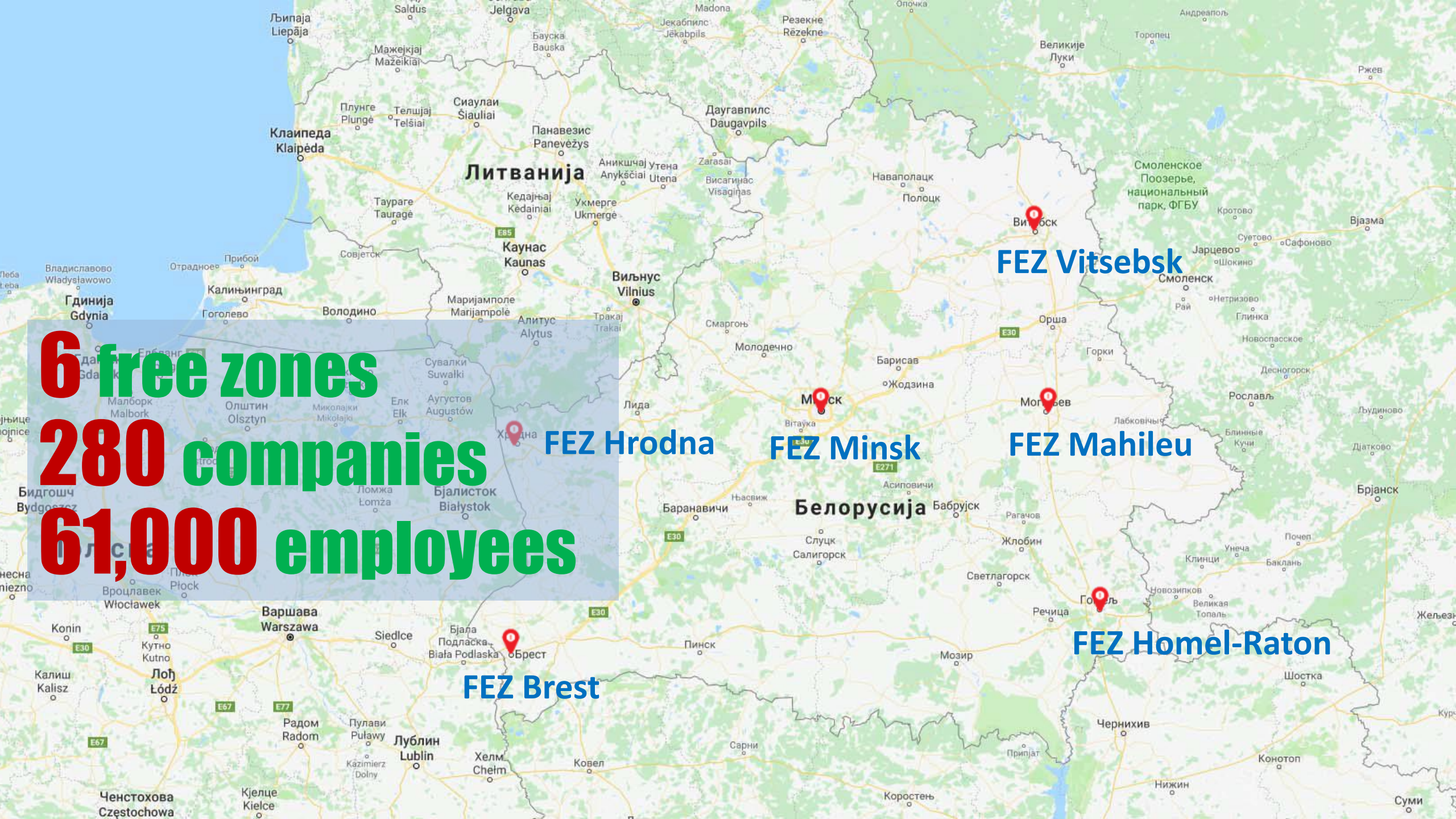
Goods FREE of import duties & VAT

EUROPEAN FREE ZONES

82 Free Zones in EU
39 West Balkans
6 Belarus

**BELARUS
FREE ZONES**

6 free zones
280 companies
61,000 employees



FEZ residents are exempt



- 10 years from profit tax;
- 50% reduced income tax after;
- 3 Years from real estate tax;
- 5 years exemption from land tax;
- 5 years from rent payments
- ...

No customs duties:

- building materials, equipment, and raw materials and components for production;
- when exporting outside the customs territory of the EEU;
- while exporting to the customs territory of the EEU





BELARUS FREE ZONES

The documents are processed within 14 days. Denial of registration of resident company can be challenged in a court.

INDUSTRIAL PARK

TARGET — ECO-CITY
WITH COMFORTABLE LIVING
CONDITIONS
150 — 200 THOUSAND PEOPLE
AND HIGH ENVIRONMENTAL
STANDARDS FOR RESIDENTS.

The logo for Great Stone, featuring a blue triangle above the text "GREAT STONE" in bold, black, sans-serif capital letters.

**GREAT
STONE**

“10+” policy

0% income tax: 0% for 10 years, 50% till 2062

Land tax

0% until 2062

Immovable property tax

0% until 2062

Customs VAT and taxes

0% for the goods imported to start the project

0% if exported outside the Eurasian Economic Union (EEU)

Dividend tax

0% for 5 year after the income is declared

Income tax

9%

**Payments to Social
Security Fund**

35 % of the national average

VAT

is returned from budget

**GREAT
STONE**

Available infrastructure

	Water supply: 31,400m ³ /day
	Wastewater discharge: 19,500m ³ /day
	Gas: 116 mln m ³ /year
	Electrical power: 50 MW
	Solid domestic waste: 4,100 ton / year
	Landline phone: 30 thousand subscriptions
	Internet gateway capacity more that 10GB/sec



Total area – 112 km²,
Area at stage 1 - 8,5 km²

**FRANCE
FREE ZONES**





Free Zone of Verdon

 **FRENCH PORT**
Port of Bordeaux

Le Verdon includes 59 hectares of free zone.
The terminals at La Verdon specialize in handling containers and timber.

**GERMANY
FREE ZONES**



An aerial photograph of the German Port of Bremerhaven. The image shows a large harbor with several large cargo ships docked at the quay. In the foreground, a red and white ship with the name 'KESS' is visible. The port is filled with numerous colorful shipping containers stacked in rows. In the background, several large gantry cranes are visible, along with a complex network of roads and railway tracks. The sky is clear and blue.

GERMAN PORT OF BREMERHAVEN

Free Port Area:

Container Terminal Columbus- Kaje with Passenger
Terminal & Fruit Terminal

SPAIN FREE ZONES



CONSORCIO DE LA
ZONA FRANCA
GRAN CANARIA



Consorcio de la Zona Franca de Tenerife

ZONA FRANCA  **CÁDIZ**
POTENCIAMOS IDEAS. GENERAMOS NEGOCIO

 **el CONSORCI**
barcelona ZONA FRANCA



ZFV
CONSORCIO ZONA
FRANCA DE VIGO



FREE ZONE BARCELONA



Polígon Industrial de la Zona Franca



**FREE ZONE
TENERIFE**

TENERIFE FTZ



- Any type of industrial, trade or services activity
- Fully exempt from import tariffs
- Indefinite storage
- Customs handling simplified

PORTUGAL FREE ZONES



PORTUGAL



Free Zone MADEIRA

Reduced tax rate of 5% until 2027,
Manufacturing companies in the Industrial Free Trade Zone may also benefit from a 50%
reduction on the taxable income

FINLAND FREE ZONES





FREEPORT OF FINLAND

OULU FREE PORT

Established in 1960 to support the foreign trade of Finland

2 TYPE OF FREE ZONES IN POLAND

**POLISH
FREE ZONES &
SEZ**





**FREE ZONES IN POLAND
is PART OF LOGISTIC CENTERS**

14 SPECIAL ECONOMIC ZONES IN POLAND



21.457 ha

Source: Magazine - Poland a true special economic zone

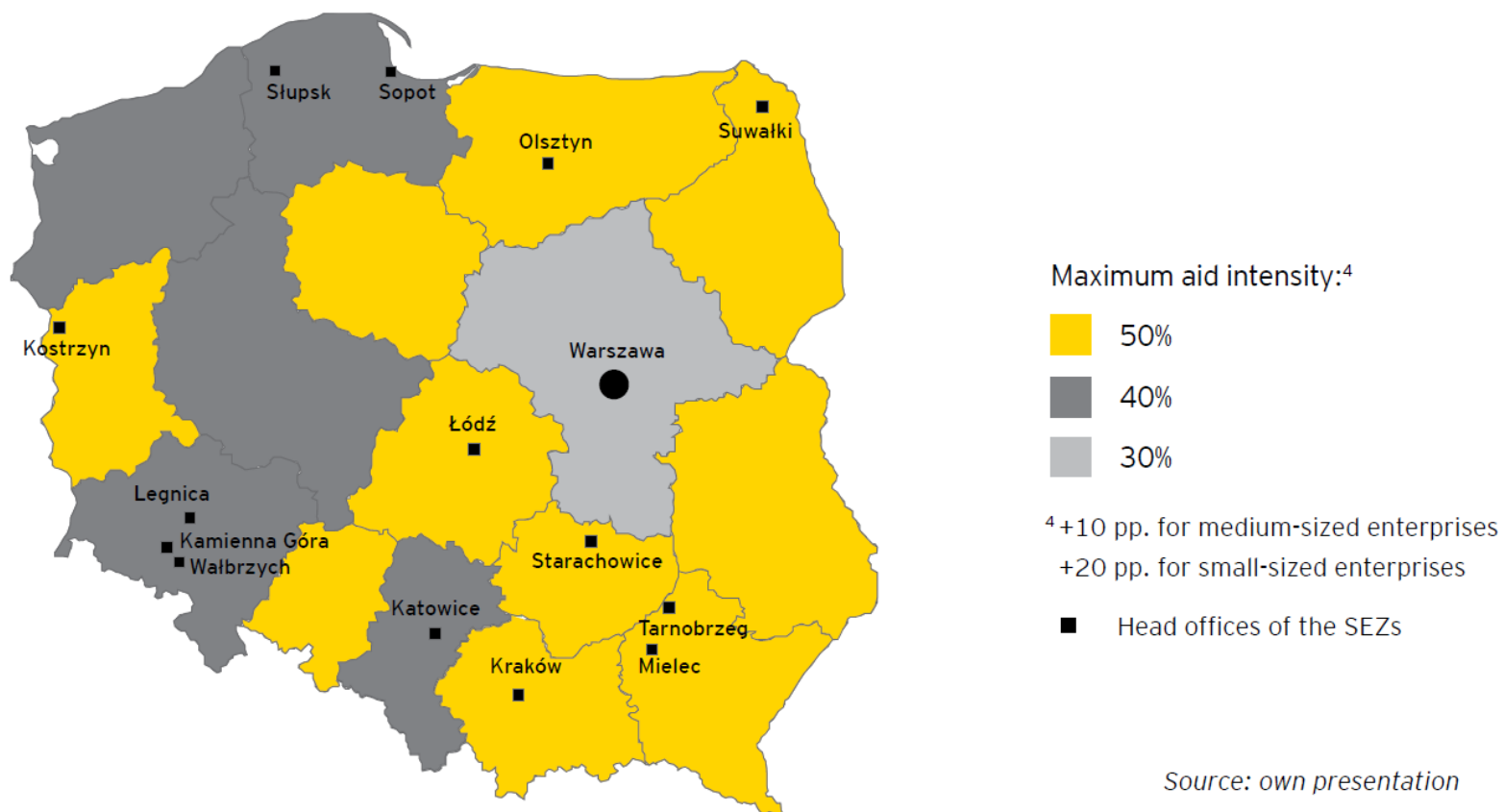
SEZ IN POLAND

What?	► Exemption in Corporate Income Tax (CIT) for legal entities or Personal Income Tax (PIT) for non-legal entities
For whom?	► Investors who have obtained the SEZ permit
How much?	► 30-70% ¹ of capital expenditures or two-year employment costs
How long?	► Till the end of SEZ existence, i.e. currently until Dec 31, 2026
Where?	► On the territory holding SEZ status ² , but in some cases also on private land that may be included in the SEZ ³

Source: Magazine - Poland a true special economic zone

SEZ IN POLAND

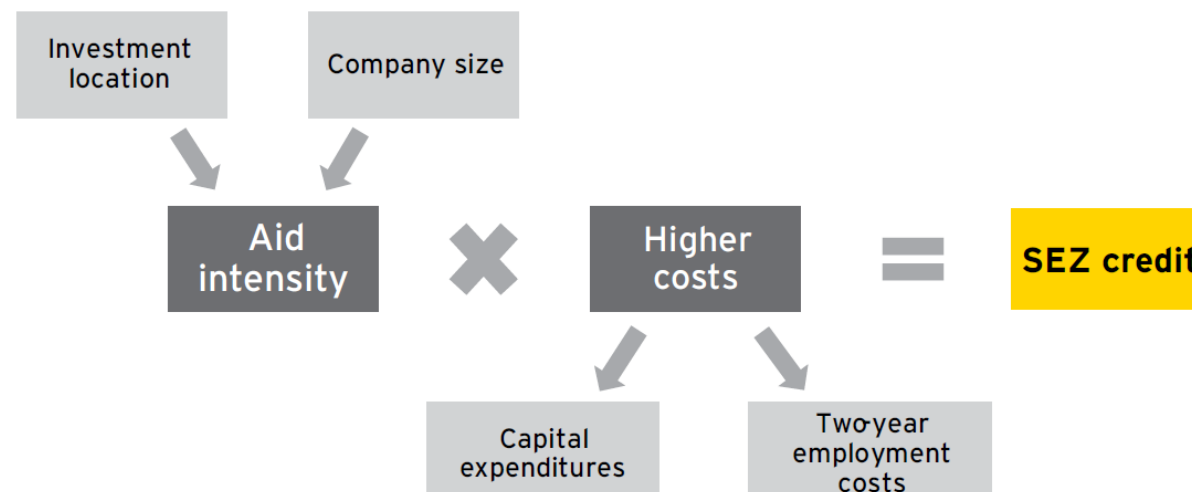
Current regional aid intensity



Source: Magazine - Poland a true special economic zone

SEZ IN POLAND

Finally, the SEZ credit is calculated as follows:

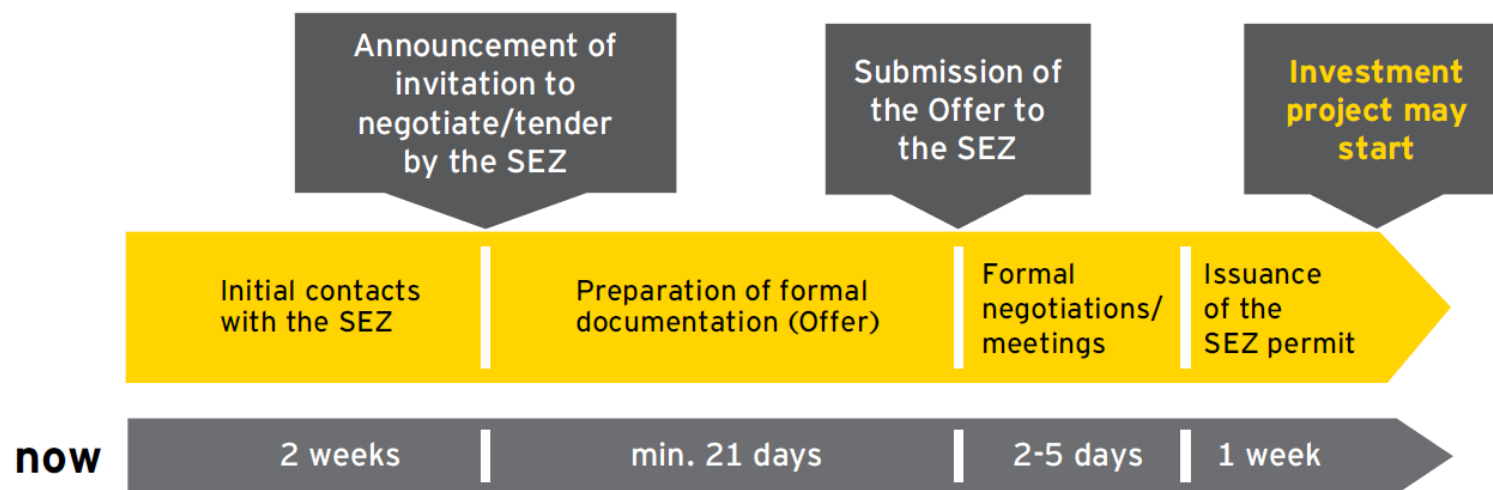


Source: own presentation

Source: Magazine - Poland a true special economic zone

SEZ IN POLAND

Procedure of applying for a SEZ permit



Source: Magazine - Poland a true special economic zone

**ROMANIAN
FREE ZONES**



FREE ZONES OF ROMANIA



FREE ZONES	AREA (ha)
South Constanza	134.6
Basarabi	11.4
Giurgiu	262.81
Sulina	101
Galati	262.81
Arad-Curtici	75
Braila	114.4

FREE ZONES OF ROMANIA

INCENTIVES

- **The land** may be leased for a period up to **50 years**;
- **No VAT and cutom duties** for the means of transportation, merchandise and other goods;
- **companies are paying 5% tax on profit**;
- **Zero VAT rate** for materials, accessories and other goods exported from Romanian customs territory into free zones;

FREE ZONES OF ROMANIA

INCENTIVES

- Customs duties are paid only in the moment when they are introduced in free circulation;
- Station of goods inside is not limited in time;
- To introduce wares inside doesn't require deposit of customs warranty or to declare a customs regime;
- For goods exported from outside European Union space you do not have to pay customs duties or VAT;

FREE ZONES OF ROMANIA

INCENTIVES

- The advantage to deposit goods inside Free Zone without paying any kind of customs duties or VAT up till the moment the goods are exported from Free Zone towards community space and only for the quantity you want to sell towards community space (European Union space)
- Transit of goods between free zones is also exempted from customs duties

39 Free Zones Westrn Balkans **NON EU**



WESTERN BALKANS

FREE ZONES





Tracking Special Economic Zones in the Western Balkans:

Paris, 19 April 2017

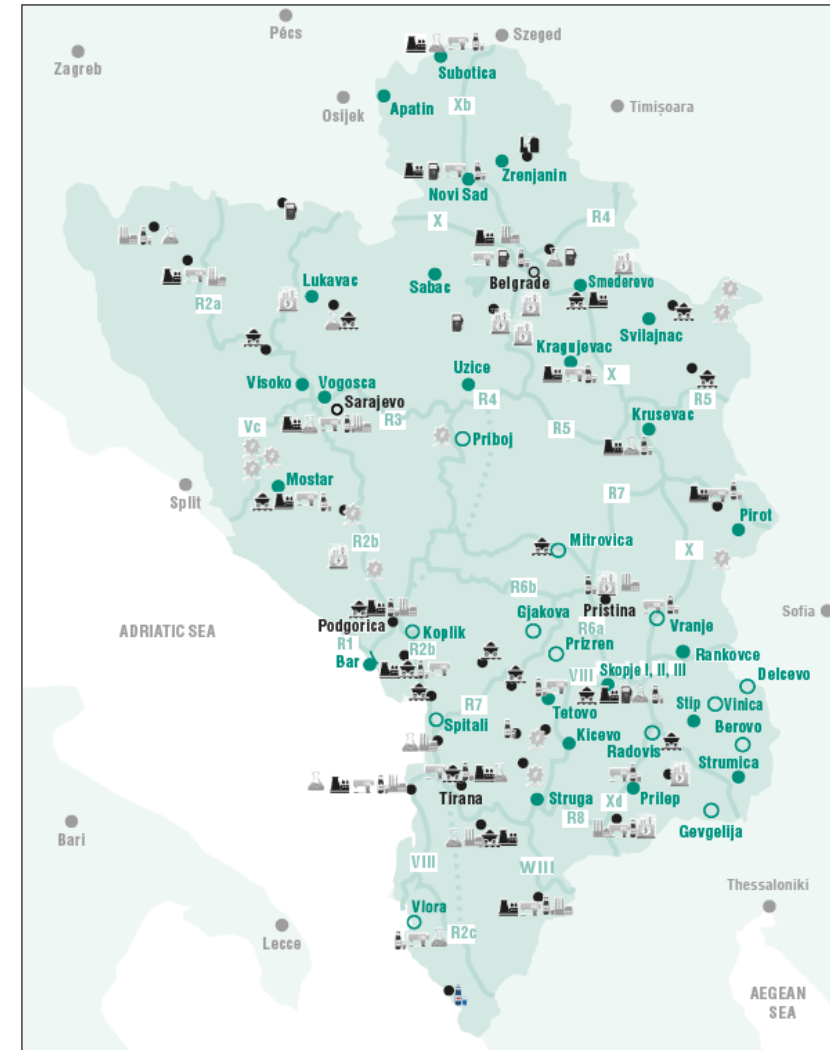
OECD Global Relations **South East Europe**



Zone network in the Western Balkan region



- Hydroelectric plant
- Thermoelectric plant
- Petroleum refining
- Food processing
- Textiles
- Gas processing
- Light industry (wood, paper, glass and ceramics)
- Chemicals
- Metallurgy
- Heavy industry (machinery, metal goods and building materials)
- Operational economic zones
- Not yet operational economic zones
- Other major cities
- Existing corridors
- Planned corridors



Development of SEZs and current state of play

Total number of SEZs in the Western Balkans, 2006-2015



- **All SEZs in the region**, with the only exception of the free port of Bar (Montenegro), **are export processing zones**.
- The **vast majority of investment** coming to the zones is in the **automotive sector**.

Source: OECD compilation of data from national SEZ authorities

Types of SEZ-specific incentives

	Fiscal incentives		Non-fiscal incentives		Other non-SEZ specific incentives
	VAT and custom duty exemptions	Income and other tax reductions	One-stop-shops and customs terminals	Infrastructure	
Albania	✓	✓	✓	✓	✓
Bosnia and Herzegovina	✓		✓	✓	✓
FYR Macedonia	✓	✓	✓	✓	✓
Montenegro	✓		✓	✓	
Serbia	✓		✓	✓	✓

* This designation is without prejudice to positions on status, and is in line with United Nations Security Council Resolution 1244/99 and the Advisory Opinion of the International Court of Justice on Kosovo's declaration of independence.

Direct economic impact of SEZs

Key indicators for SEZs in the Western Balkans – aggregated numbers

400 foreign companies
invested in SEZs in WB

30 000 new jobs created

**Total investment of EUR
2.5 billion**

SEZs encompass an area of
3 000 hectares
in the Western Balkans

SEZs represent up to
1/3 of all exports
in some economies

SEZs represent **50%**
of manufacturing export
in some economies

Key indicators for SEZs per economy

Economy	Total number of zones	Number of active zones ¹	Size (ha)	Number of enterprises	Cumulative zone investment (EUR million)	Number of employees	Total turnover 2015 (EUR million)	Zone exports as % of total exports
Albania	3	0	494 (planned)	0	0	0	0	0
Bosnia and Herzegovina	4	4	79.5	95	n/a	1 700	303	6.4
Former Yugoslav Republic of Macedonia	15	6	893	23	207	6 800	1 475	36.4
Kosovo	3	0	530	0	0	0	0	0
Montenegro	1	1	130	36	5	398	7.6	n/a
Serbia	14	10	1 615	241	2 240	2 2242	2 431	17.6

Source: Data from zone authorities compiled by the OECD and OECD calculations based on national statistics.

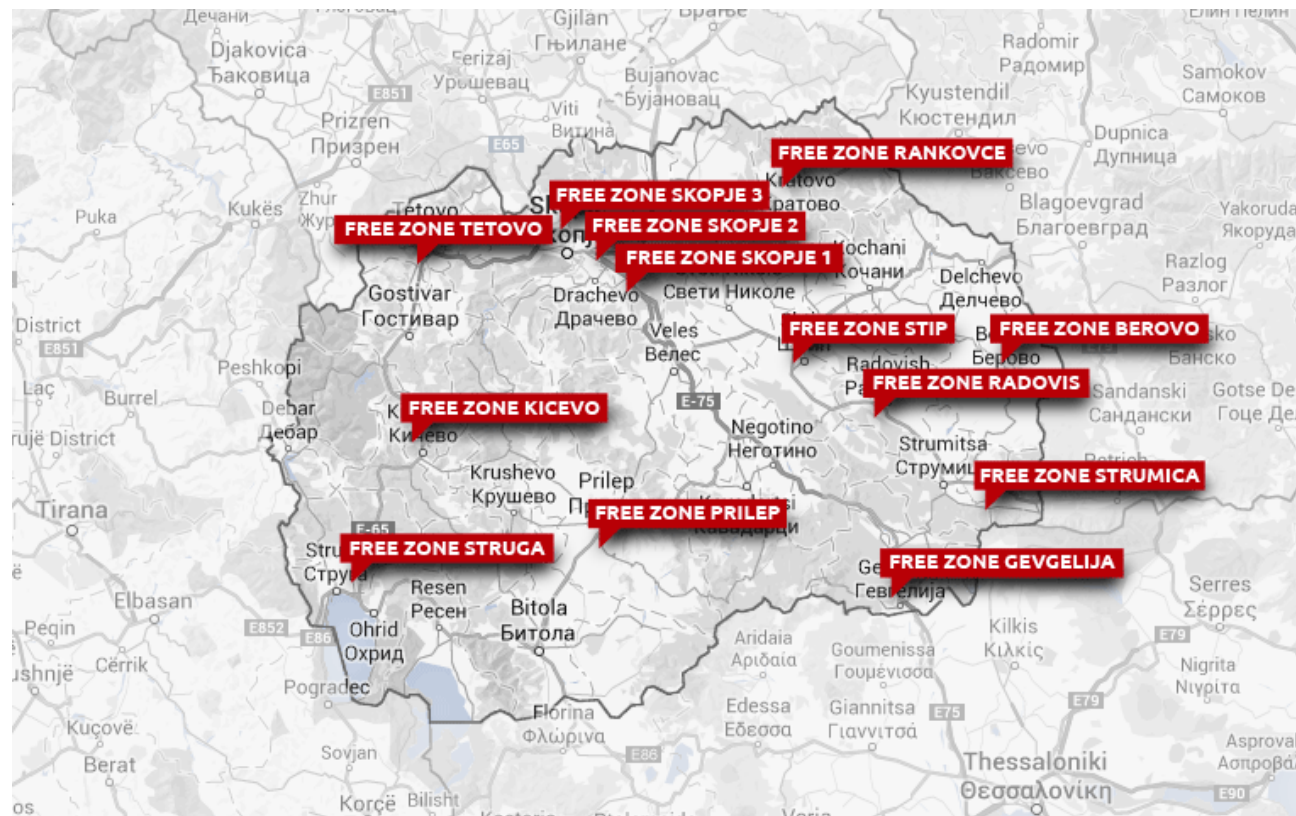
The image features a large, stylized Macedonian flag on the left side. It consists of a red field with a golden sun in the center, which has eight rays extending to the edges of the flag. Overlaid on the center of the sun is a semi-transparent square containing the text "MACEDONIAN FREE ZONES" in bold, dark blue, sans-serif capital letters.

MACEDONIAN FREE ZONES

A map of the Balkan region is shown on the right side of the image. The map is in grayscale, with country borders outlined in white. North Macedonia is highlighted in a solid green color. To the right of the green highlight, the text "EU candidate" is written in a dark blue, sans-serif font.

EU candidate

15 FREE ZONES OF MACEDONIA



FREE ZONES OF MACEDONIA

TAX	TAX RATES	
	TIDZs	Outside TIDZs
Corporate tax	0% Up to 10 years	10%
Personal income tax	0% Up to 10 years	10%
Value added tax	0%	18%
Excise taxes	0%	5% - 62%

FREE ZONES OF MACEDONIA

PRODUCT	CUSTOMS DUTY	
	TIDZs	Outside TIDZs
Equipment	0%	5% - 20%

FREE ZONES OF MACEDONIA

- Complete infrastructure;
- No municipal utility tax;
- Customs outpost in the zones;
- Subsidy of up to €500,000 for construction costs;
- Long-term lease of land up to 99 years;
- Training and job creation grants.

FREE ZONES OF MACEDONIA

MAIN INDUSTRIES

Automotive components, textiles, metals, food and beverages, fruit and vegetable processing, energy, chemicals, pharmaceuticals

EXPORTS

EUR 1.7 billion in 2016
(40% of total national export)



**39 Free Zones
in NON EU**

+

**11 Free zones
In Turkey**

A large, stylized graphic of the Turkish flag, featuring a red field with a white crescent and star, positioned diagonally across the left side of the image.

TURKEY FREE ZONES



174 Companies
18.200 Employees

Sector Focus

- Aerospace and Defense Industry,
- Automotive Spare Parts

TURKEY FREE ZONE



ESBAS - Tax Advantages

- 100% exempt from corporate tax.
- Wages of workers are exempt from income tax (company exporters 85%).
- Goods and machinery are exempt from customs tax.
- No value added tax for goods and services.
- Goods of Turkish origin may be exempt from export procedures.





MERSİN FREE ZONE

TURKEY FREE ZONE



The image features a large, diagonal, close-up view of the Serbian flag, showing its red, blue, and white horizontal stripes and the Serbian coat of arms. A semi-transparent circle is centered over the flag, containing the title text.

SERBIAN FREE ZONES





СРПСКА АКАДЕМИЈА
НАУКА И УМЕТНОСТИ

Огранак у Нишу



ГРАД ПИРОТ



UGOVORNA OKRUŽNA
PRIVREDNA
KOMORA
PIROT



FAKULTET ZA
MENADŽMENT
ZAJEČAR



SERBIAN FREE ZONES

а научно-с
ВОЈ И ПРЕ
от, Републ



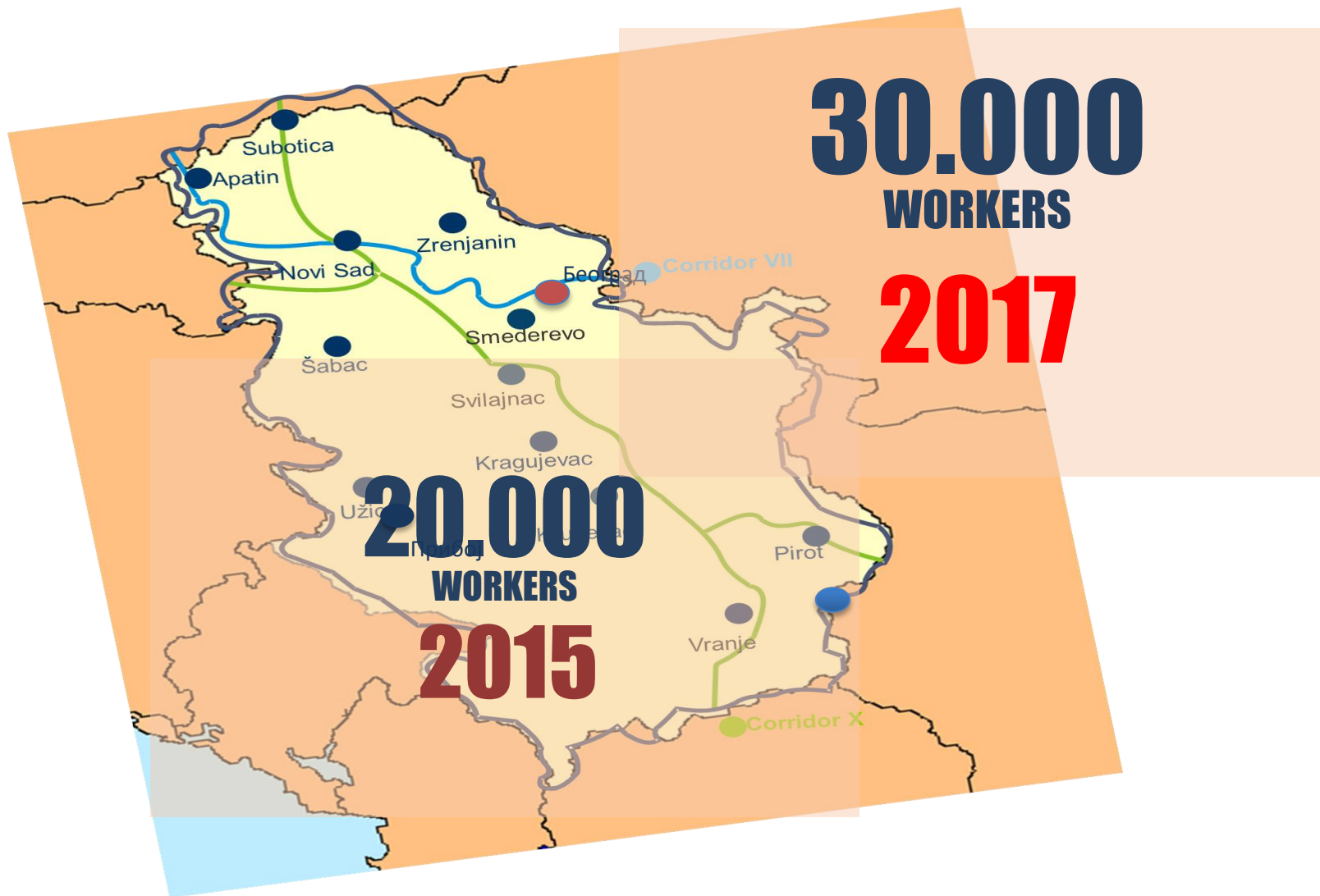
Кондири

15. децембар 2018. године



14

EXPORT PROCESSING SERBIAN FREE ZONES



SIEMENS



260
PRODUCTION
COMPANIES



VESCOVINI GROUP



Subotica

kolpa



MAGNETI
MARELLI

Novi Sad

Zrenjanin

Corridor VII



Šabac

Smederevo

Svilajnac

Panasonic



Kragujevac



Užice

Kruševac



Pirot



Vranje

Corridor X

TURNOVER



PRODUCTION

**0,9
BILLION EUR
2012**

**3
BILLION EUR
2017**



EXPORT



INVESTMENTS

755
MILLION EUR
2012

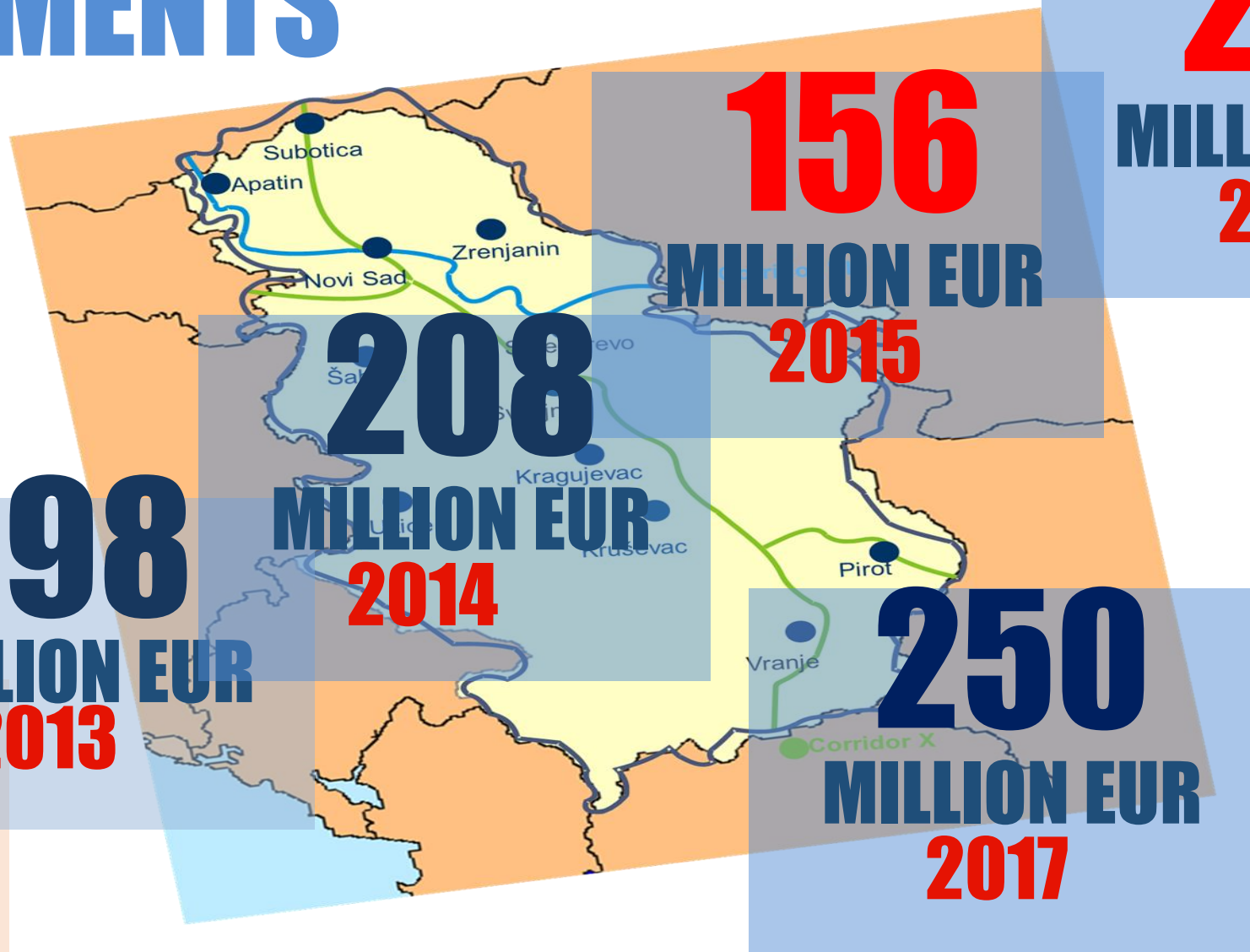
198
MILLION EUR
2013

208
MILLION EUR
2014

156
MILLION EUR
2015

250
MILLION EUR
2017

210
MILLION EUR
2016





**TAX FREE
NO
CUSTOMS
DUTY**

**IS VERY GOOD FOR
BUSINESS**



ГРАД ПИРОТ

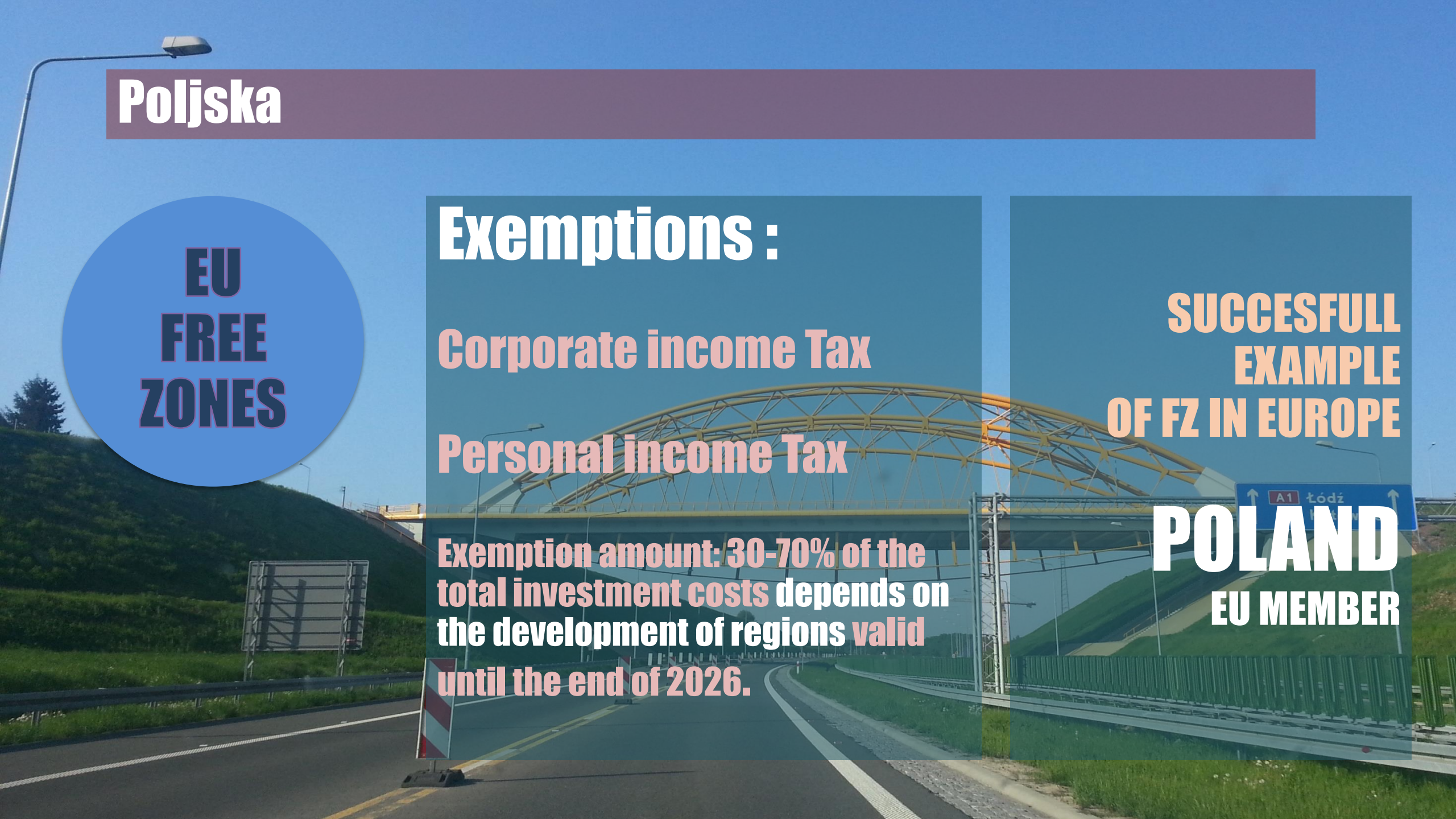


1. Poreska oslobođanja u EU

ЛИНИ РАЗВОЈ И ПРЕКОГРАНИЧНА САРАДЊА

Пирот, Република Србија

15. децембар 2018. године



Poljska

**EU
FREE
ZONES**

Exemptions :

Corporate income Tax

Personal income Tax

**Exemption amount: 30-70% of the
total investment costs depends on
the development of regions valid
until the end of 2026.**

**SUCCESSFUL
EXAMPLE
OF FZ IN EUROPE**

POLAND
EU MEMBER

Poljska



**EU
FREE
ZONES**

Investitori u zonama imaju umanjjenja:

- **Poreza na dobit do 70%**
- **Porez na zarade fizičkih lica do 50%**
- **Porez na imovinu**

Produženo do 2026. godine

EU FREE ZONES

THE NATIONAL INCENTIVES SCHEME

Tax incentive	Corporate income-tax relief for up to ten years for new companies
	Partial corporate income-tax relief for up to ten years for existing companies
Job-creation grants	Financial support for creation of new jobs
Training and retraining grants	Financial support for training and retraining of new employees
Cash grant for capital investment	Financial support in the case of strategic investments in manufacturing or in technology centres
Property tax incentive	Property tax exemption for up to five years
Site support	Transfer of public land at a favourable price

EU FREE ZONES

II Međunarodna
konferencija

Kaunas FEZ:
534 Ha



The main advantages of Kaunas FEZ

Tax	General	FEZ
Income tax	15 %	0 % (first 6 years) 50% of the tax rate (subsequent 10 years)
Property tax	1 %	0 %
Dividend tax	15 %	0 %

15. децембар 2018. године

**EU
FREE
ZONES**

II Me
ион

Po zakonu o slobodim zonama čl.36 i 37:

- **Umanjenje poreza na dobit do 75%
(regionalni ključ)**
- **Ne plaća se PDV na unos robe**

**EU
FREE
ZONES**

II Me
ион

Po zakonu :

- **Umanjenje poreza na dobit do 100% za regione sa većom nezaposlenosti**
- **Preferencijalni PDV režim za investicije**



ГРАД ПИРОТ



UGOVORNA OKRUŽNA
PRIVREDNA
KOMORA
PIROT



FAKULTET ZA
MENADŽMENT
ZAJEČAR



међународна научно-стручна конференција
ОПШТИ РАЗВОЈ И ПРЕКОГРАНИЧНА САРАДЊА

1. Poreska oslobođanja u svetu

15. децембар 2018. године

**WORLD
FREE
ZONES**

II M
ЕГИОП

- **Poreza na dobit**
- **Porez na zarade**
- **Carina i PDV na svu robu**

WORLD FREE ZONES

II M
ЕГИОН

- **Povraćaj carina izvoznicima**
- **Nema carine i poreza u zonama „Maquila“**
- **Strane firme ne plaćaju porez na dobit (uslov da 50% prihoda imaju van Mexica)**

**WORLD
FREE
ZONES**

II Ме
ЕГИОН

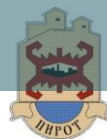
- **Poreza na dobit do 100% na period od 5 godina**
- **Carina i PDV u zonama**

15. децембар 2018. године

Thailand

ОПШТИНА ПИРОТ
НАУКА И УМЕТНОСТИ

Огранак у Нишу



ГРАД ПИРОТ



UGOVORNA OKRUŽNA
PRIVREDNA
KOMORA
PIROT



FAKULTET ZA
MENADŽMENT
ZAJEČAR



**WORLD
FREE
ZONES**

II Ме
РЕГИОНАЛНИ ГАЗДОВИ И ПРЕКОНТАЛНА САРАДЊА

- **Nema poreza na dobit do 100% u periodu od 7-8 godina**
- **Nema carine i PDV-a na opremu, robu**

Пирот, Република Србија

15. децембар 2018. године



Više od 25 procenata svetskog prometa obavlja se u oko 10.000 slobodnih zona



Efikasnost slobodnih zona u svetu

IZVOZ SVET

2002

2003

2005

mil USD

6.400.000

7.400.000

9.352.000

IZVOZ PREKO SLOBODNIH ZONA

2005

mil USD

Raspoloživi podaci
2.200.000

Učešće SZ u
odnosu na ukupan
izvoz
%

oko 24 %

Efikasnost slobodnih zona u Srbiji

IZVOZ
SRBIJA 2005
mil USD

4.482

IZVOZ PREKO
SLOBODNIH
ZONA 2005
mil USD

110

Učešće SZ u
odnosu na
ukupan izvoz
%

2,45 %

DESET PUTA MANJI IZVOZ IZ SLOBODNIH ZONA SRBIJE U ODNOSU NA SVETSKI PROSEK

Efikasnost slobodnih zona u Srbiji

IZVOZ
SRBIJA 2010
mil USD

7.400

IZVOZ PREKO
SLOBODNIH
ZONA 2010
mil USD

370

Učešće SZ u
odnosu na
ukupan izvoz
%

5 %

PET PUTA MANJI IZVOZ IZ SLOBODNIH ZONA SRBIJE U ODNOSU NA SVETSKI PROSEK

Efikasnost slobodnih zona u Srbiji

IZVOZ
SRBIJA 2011
mil USD

8.400

IZVOZ PREKO
SLOBODNIH
ZONA 2011
mil USD

560

Učešće SZ u
odnosu na
ukupan izvoz
%

6,7 %

IZVOZ IZ SLOBODNIH ZONA SRBIJE SE POPRAVLJA



Napredak Slobodnih zona Srbije 2005 - 2011



JOŠ DALEKO OD SVETSKOG PROSEKA



Koliko to može da košta državu?



Prihod od postojećih korisnika

Prihod od poreza na zarade, imovinu i dobit preduzeća
postojećih korisnika slobodnih zona 2013.

Visina **poreskih prihoda** postojećih korisnika slobodnih zona

GODIŠNJI IZNOS (M EUR)

ORJENTACIONA VISINA PORESKIH PRIHODA POSTOJEĆIH KORISNIKA SLOBODNIH ZONA	POREZ NA ZARADE (10%) 20% od 10%		POREZ NA DOBIT (15%)
POSTOJEĆI KORISNICI			
Postojeća radna mesta – 14.579 Neto zarada 14.579x380x12 = 66,5 mil Evra	1,4		
Dobit oko 80 miliona Evra (PROCENA)			12,0
UKUPNO	13,4		

Izvor: www.privsav.rs Prosečna bruto zarada 60.102, neto 43.615 RSD

Visina **prihoda od doprinosa** na zarade postojećih korisnika

POZITIVNI EFEKTI PORESKIH OSLOBOĐENJA ZA SVE KORISNIKE	GODIŠNJI IZNOS (M EUR)		
	PRIHOD DRŽAVE OD DOPRINOSA NA ZARADE		
	PIO 11%+13%	ZDRAVSTVO 2X6,15%	DOPRINOS ZA NEUPOSLENOST 2x0.75%
Postojeća radna mesta Bruto zarada 14.579x522x12 zarade 91,43 miliona evra	22	11,2	1,4
UKUPNO	34,6		

Visina posmatranih prihoda od postojećih korisnika – 48 M

Analiza oslobađanja od poreza

Efekati oslobađanja od poreza na zarade, imovinu i dobit preduzeća u slobodnim zonama.

“A” Oslobađanja isključivo za **nove** proizvodnje i **nova radna mesta**

“B” Oslobađanja od poreza na zarade, imovinu i dobit preduzeća **za sve** korisnike slobodnih zona (stara i nova radna mesta)

**A. Oslobađanja isključivo za nove
proizvodnje i nova radna mesta**

- Ukupna površina svih Slobodnih zona u Srbiji je sada **9.774.972m²**
- Odnos izgrađenog u odnosu na neizgrađeno zemljište je oko 70% što bi iznosilo **2.932.491 m²** slobodnog prostora za izgradnju
- Orijentacioni broj zaposlenih na 100 m² proizvodnog prostora je **2** što daje ukupan broj mogućih novih **radnih mesta oko 58.649**.
- Predračunska vrednost mogućih novoizgrađenih objekata **821** miliona evra (oko 280 evra/m²)

Poreska oslobađanje za nova radna mesta

ORJENTACIONA PORESKA OSLOBOĐENJA ZA NOVE PROIZVODNJE I NOVA RADNA MESTA	GODIŠNJI IZNOS POREZA (MIL EUR)		
	POREZ NA ZARADE (10%)		POREZ NA DOBIT (15%)
	20% od 10%		
Osnovica za oporezivanje zarade 58.649 radnih mesta x 380 x 12 meseci = 267 miliona evra	5,34		
Očekivani obim poslovanja 3.000 – dobit 240 mil EUR			36,0
UKUPNO GODIŠNJE		- 41,34	

*Ostaje korisnicima za
reinvestiranje*

država gubi

Efekat **povećanja doprinosa** na osnovu otvaranja novih radnih mesta

POZITIVNI EFEKTI PORESKIH OSLOBOĐENJA ZA NOVE PROIZVODNJE I NOVA RADNA MESTA	GODIŠNJI IZNOS (EUR)		
	PRIHOD DRŽAVE OD DOPRINOSA NA ZARADE		
	PIO 11%+13%	ZDRAVSTVO 2X6,15%	DOPRINOS ZA NEUPOSLENE 2X0.75%
Nova radna mesta 58.649 zaposlenih x 522 evra mesečno x 12= 367,4 miliona evra	88,17	45,16	5,5
UKUPNO GODIŠNJE		+138,87	

novi prihod države

Zaključak Varijante A.

Da bi RS dobila **58.649 nova radna mesta** potrebno je država **oslobodi** korisnike zona **poreza na zarade (deo 20%) i poreza na dobit** u ukupnom iznosu od **48** miliona evra godišnje.

Kroz povećanje prihoda od doprinosa za 58.649 **novih** radnih mesta prihod iznosi **138,9** miliona evra, **država ima povećan prihod od 90,9 miliona evra.**

$$138,9 - 48 = 90,9 \text{ M Evra}$$

na kraju država dobija

Zaključak Varijante A
oslobađanja isključivo za **nova radna mesta**



**Nema budžetskih gubitaka po osnovu poreskih
oslobađanja jer sredstva nisu ni bila planirana!**

B. Oslobađanja za sva radna mesta (stara i nova)

Orijentacioni broj zaposlenih

novih 58.649 + 14.579 starih = 73.228
radnika

Poreska oslobođenja za sve korisnike SZ

ORJENTACIONA PORESKA OSLOBOĐENJA ZA SVE KORISNIKE SLOBODNIH ZONA	POREZ NA ZARADE (10%)	POREZ NA DOBIT (15%)
POSTOJEĆI KORISNICI (REALAN GUBITAK)	(20% po novom Zakonu)	
Postojeća radna mesta umanjena zaporeska oslobođenja. Bruto zarada $14579 \times 380 \times 12 = 66,5$ miliona Evra	1,4	
Dobit 80 miliona evra		12
UKUPNO	13,4	
NOVI KORISNICI		
Novi objekti $2.932.491 \text{ m}^2$ vrednost 821 miliona Eura		
Nova radna mesta Bruto zarada umanjena zaporeska oslobođenja $58649 \times 380 \times 12 = 367,4$ miliona Eur	5,3	
Projektovana moguća dobit - 240 miliona Eura		36,0
	41,3	
UKUPNO GODIŠNJE	- 54,7	

Ostaje korisnicima za reinvestiranje

država gubi

Prihod svih korisnika

POZITIVNI EFEKTI PORESKIH OSLOBOĐENJA ZA SVE KORISNIKE	GODIŠNJI IZNOS (EUR)		
	PRIHOD DRŽAVE OD DOPRINOSA NA ZARADE		
	PIO 11%+13%	ZDRAVSTVO 2X6,15%	DOPRINOS ZA NEUPOSLENOST 2 X0.75%
Postojeća radna mesta Bruto zarada 14579x522x12 zarade 91,43 miliona evra	21,9	11,2	1,4
Nova radna mesta 58649x522x12 – bruto zarade 367,4 miliona evra	88,17	45,19	
UKUPNO GODIŠNJE		173,3	

novi prihod države

Zaključak Varijante B.

Kada se oslobode SVI korisnici zona poreza na zarade (20%) i poreza na dobit ukupan iznos je oko **54,7 miliona evra** godišnje.

Kroz **povećanje prihoda od doprinosa** za 58.649 nova radna mesta dodatni prihod iznosi 138,9+34,5 (doprinosi postojećih radnika) =
173,4 M Eur,
država ima dodatni prihod

$$173,4 - 54,7 = 118.7 \text{ M Eur godišnje}$$

na kraju država dobija

Uticaj plata na okruženje - novi PDV prihod

POZITIVNI EFEKTI PORESKIH OSLOBOĐENJA ZA SVE KORISNIKE	GODIŠNJI IZNOS (M EUR)		
	PRIHOD DRŽAVE OD PDV na potrošnju		
	pretpostavljena potrošnja (90% plate)	stopa 20%	
Postojeća radna mesta i nova radna mesta			
73.228x522x12 – bruto zarade 458,7 Miliona Evra	412,83	82,6	
UKUPNO GODIŠNJE	118,7 + 82,6 = 201,3		

ukupni prihod !

Zaključak Varijante A&B

Ukoliko se ispune ciljevi slobodnih zona država u obe varijante nema novčane gubitke a ostvaruje:

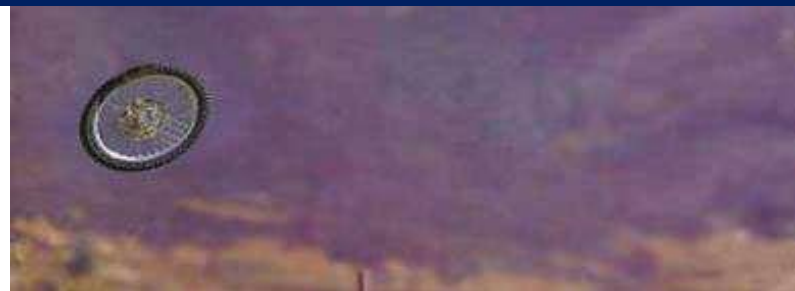
- **74.000 radnih mesta** u slobodnim zonama
- **direktne investicije** u iznosu od 821 Milion evra (novi objekti i oprema)
- **povećanje izvoza**
- **priliv novog znanja i tehnologija**
- povećanje prihoda od doprinosa
- povećanje prihoda od PDV-a



Hipoteza:
Veće pogodnosti dovode do većeg priliva direktnih stranih
investicija



Dok ne probamo ne možemo da znamo!





СРПСКА АКАДЕМИЈА
НАУКА И УМЕТНОСТИ

Огранак у Нишу



ГРАД ПИРОТ



ПОДРОВА ОРЕЉИНА
ПРИВРЕДНА
КОМОРА
ПИРОТ



ФАКУЛТЕТ ЗА
МЕНАѢЖМЕНТ
ЗАЈЕЧАР



УНИВЕРЗИТЕТ
У НОВИ САДУ



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