



R&D TAX INCENTIVES IN ROMANIA

Five powerful reliefs to reward your innovation

Romania offers one of Europe's most generous stacks of R&D tax incentives – combining a salary income tax exemption subject to statutory conditions, accelerated amortization, additional deductions, and a new direct tax credit – to substantially reduce the cost of qualifying research and development.

**Innovate here.
The tax system rewards you for it.**

- Salary income tax exemption for employees deriving salary income from qualifying R&D and innovation activities, subject to Art. 60(3) of the Fiscal Code and required project-level documentation
- 50% additional tax deduction OR new 10% direct tax credit on eligible R&D costs
- Recover 50% of R&D equipment cost in Year 1 through accelerated amortization
- Corporate income tax exemption in the first 10 years of activity, subject to statutory R&D qualification conditions



WHAT QUALIFIES AS R&D?

Qualifying R&D comprises applied research and technological development, including experimental development, that can be supported by a clear technical narrative and project-level evidence.

01 Novelty

Advancing the state of knowledge or practice

02 Creativity

Based on original concepts or hypotheses

03 Uncertainty

Outcome not predictable in advance

04 Systematic approach

Planned, documented methodology

05 Transferability

Results can be shared or repeated

QUALIFYING ACTIVITY EXAMPLES

- New algorithm development or AI/ML model research
- Novel rendering techniques or game-engine innovation
- Software architecture solving genuine technical uncertainty
- Medical-device prototyping and clinical testing
- New manufacturing processes with technical uncertainty

TYPICALLY EXCLUDED

- Routine software maintenance or bug fixing
- Market research or business process optimisation
- Standard quality control or compliance testing
- Reverse engineering without advancement

WHO QUALIFIES

- Romanian legal entities subject to CIT or IMCA
- Foreign entities operating through a Romanian permanent establishment
- Entities registered with ANAF performing qualifying R&D projects
- Employees under qualifying contracts performing R&D / innovation activities

FIVE INCENTIVES AT A GLANCE

Salary income tax exemption

Subject to Art. 60(3) conditions

Employees deriving salary income from qualifying R&D and innovation activities may benefit from Romanian personal income tax exemption, subject to required project-level documentation.

50% supplementary deduction

Amplify every RON you spend on R&D

Deduct 150% of eligible R&D costs from taxable profit instead of 100% – effectively saving 8% of eligible spend in CIT.

NEW 2026

10% R&D tax credit

Direct credit against CIT or IMCA on eligible R&D costs. Excess credit carries forward 4 years or may be refunded, subject to procedure.

Accelerated amortization

50% of R&D equipment cost in Year 1

Deduct 50% of the book value of R&D apparatus and equipment in the first fiscal year of use. Combinable with either route.

10-year CIT exemption

First 10 years of activity

Corporate income tax exemption in the first 10 years of activity, subject to statutory R&D qualification conditions and scope review.

CREDIT vs DEDUCTION | RON 1M eligible costs

RON 100k

10% credit ✓

RON 80k

50% deduction

Credit wins by RON 20,000 → choose annually

Commercial message, not legal advice. Each incentive requires project-level eligibility analysis and supporting documentation.

HOW TO CLAIM

- 1 Feasibility scoping**
Identify qualifying projects and estimate benefit vs. claim effort.
- 2 Technical eligibility analysis**
Interview R&D leads; test novelty, uncertainty and systematic approach.
- 3 Financial cost mapping**
Map staff, materials, subcontracted R&D, amortization and attributable overheads.
- 4 Prepare R&D defense file**
Compile project scope, objectives, duration, field, budget and results.
- 5 Expert certification**
For large taxpayers, obtain independent expert certification.
- 6 Tax return filing**
Apply the chosen route in the annual CIT/IMCA declaration; register credit evidence.
- 7 Ongoing monitoring**
Refresh files annually and stay inspection-ready.

DOCUMENTATION CHECKLIST

- Project technical description
- Evidence of novelty, creativity and uncertainty
- Evidence of systematic approach and transferability
- Timesheets / effort-allocation records
- Employment contracts and R&D job descriptions
- Supplier invoices and eligible cost mapping
- General ledger links to R&D projects
- Expert certification request/order, where applicable
- Tax evidence register entries for credit regime

Filing deadline: 25 June of the following year for 2026 returns, subject to applicable rules.

ACCELERATED AMORTIZATION + 10% TAX CREDIT

Scenario: a CIT payer invests RON 600,000 in specialist R&D laboratory equipment and incurs RON 400,000 in additional eligible R&D staff and material costs during Year 1.

Eligible R&D costs

RON 1.0m

Year 1 tax benefit

RON 128.8k

Effective relief rate

12.9%

PART 1 – ACCELERATED AMORTIZATION ON R&D EQUIPMENT

Item	Normal	Accelerated
Equipment value	RON 600,000	RON 600,000
Year 1 amortization deduction	RON 120,000	RON 300,000
Extra deduction vs. normal	–	RON 180,000
CIT saving at 16%	–	RON 28,800

PART 2 – 10% R&D TAX CREDIT

Item	Value
Total eligible R&D costs	RON 1,000,000
10% tax credit	RON 100,000
Credit deducted from CIT due	RON 100,000
If CIT < credit	4-year carry-forward or refund

The credit route outperforms the 50% deduction route by RON 20,000 in this illustration (RON 100,000 direct credit vs. RON 80,000 CIT saving from the deduction).

CREDIT MECHANICS AND KEY SAFEGUARDS

TWO AVAILABLE R&D INCENTIVE ROUTES

Current route

- 50% supplementary deduction from eligible R&D costs
- Accelerated amortization for R&D apparatus and equipment
- CIT exemption in the first 10 years of activity

Alternative route – NEW 2026

- 10% credit from total eligible R&D costs
- Credit is deducted annually from CIT / IMCA and recorded in the fiscal evidence register
- Cannot be combined with the 50% supplementary deduction

CREDIT UTILISATION RULES

- If the credit is used only partially, the difference may be offset against outstanding fiscal obligations or refunded within 4 fiscal years.
- The 4-year period starts on day one of the fiscal year following the year for which the credit is determined.
- Offset/refund exclusions apply for supplementary / national supplementary tax under Pillar 2 and withholding tax obligations.
- For CIT groups, credits are aggregated and applied at the level of the group leader.
- The application procedure is to be approved by Ministry of Finance Order.

Can we combine the 50% deduction and the 10% credit?

No. They are alternatives selected annually. Accelerated amortization may be combined with either route.

Source basis: OUG 8/2026 mechanics as summarised in the Cluj seminar slides 3-4; legal implementation should be reviewed before filing.

READY TO UNLOCK YOUR R&D INCENTIVES?

A short feasibility review can determine which route is more valuable, what documentation is missing, and whether the claim is ready for filing or expert certification.

1 Schedule a 30-minute discovery call

2 Receive a no-obligation feasibility estimate

3 Engage BDO for eligibility analysis, documentation and claim support

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