

# THE CONCEPT OF REAL ESTATE TAXATION BASED ON THE *AD VALOREM* PRINCIPLE

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## Summary

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It is an official description, list and register of real estate (land and real estate) made for tax purposes. Within this description the value of the property and the list of incomes generated by the property is assessed. In Poland, preparations for the introduction of the cadastre system have fiscal purposes. According to the assumptions, the currently valid principles of taxation concerning real estate tax, agricultural tax, forest tax and tax on inheritance and donations will be replaced by the new regulation. Instead of taxing according to the area of the property, the base for calculating tax will be the property value<sup>4</sup>.

**Keywords:** register, ad valorem, real estate, taxation.

## Register of real estate

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According to planes the cadastre system will not comprise only the fiscal cadastre. It will also include real estate cadastre and land and mortgage cadastre. Today the regulations governing the future cadastre system are the

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<sup>4</sup> See: Wołowiec T., Biliński J.: *Reforma podatku od nieruchomości szansą wzrostu dochodów własnych gmin uzdrowiskowych*. „Biuletyn Informacyjny Stowarzyszenia Gmin Uzdrowiskowych RP” 2002 no 1. pp. 53 – 62; Wołowiec T.: *Reforma systemu opodatkowania nieruchomości w Polsce*. „Ekonomika i Organizacja Przedsiębiorstwa” 2002 no 8, pp. 34 – 42.

act on real estate management and implementation rules laid down in the regulation on common taxation of real estate. It is also planned to prepare a separate act on the cadastre system. The changes will be implemented gradually and the whole operation will be finished around 2010. The valid regulations stipulate that the cadastral value be determined for real estate mentioned in the provisions of the real estate tax. In order to establish the cadastral value, the authorities running the cadastre will hold common taxation of property. The cadastral value of the property is established on the basis of assessing real estate representative for particular types of real estate in the area of a given commune. The value of representative real estate is determined using the transaction prices in the area of the commune. If there are not enough transactions – the area of an adjacent commune is taken into account. The activities of estimating representative property in order to define the cadastral value and to draw up taxation maps and tables is performed by real estate appraisers<sup>5</sup>.

Cadastral values, determined in the process of common taxation of real estate, should reflect differences existing between particular properties and they should aim at getting as close to the market price as possible with the principles of mass valuation. The basis for determining the cadastral value of particular real estate are taxation maps and tables. The value is established for the whole property or its parts if they have been singled out as taxation objects in regulations on real estate tax. The cadastral value of a land property is the cadastral value of the land and of its elements. A taxation unit with reference to the land is a plot of land or its part with different allocation than the neighboring plots or the remaining part of the plot, determined in the local spatial development plan or another way of using a given part of the plot if the spatial development plan has not been prepared. A taxation unit with reference to the elements of the land is a building, a flat in a multi-flat building or another premise permanently fixed to the ground. The value of the property in the taxation process is established taking into account characteristic features of the property affecting its cadastral value. For this purpose two types of land are differentiated: developed property or property allocated for development, and property allocated for other than agriculture and forest purposes and agriculture and forest property<sup>6</sup>.

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<sup>5</sup> Compare: Wołowiec T.: *Reforma systemu opodatkowania nieruchomości w Polsce szansą pobudzenia rozwoju lokalnego i regionalnego samorządów terytorialnych*. „Studia Regionalne i Lokalne” 2003 no 4, pp. 125 – 137.

<sup>6</sup> See: Wołowiec T.: *Integracja z UE i reforma opodatkowania nieruchomości a finanse jednostek samorządu terytorialnego* [in:] Czekaj J. (ed.) *Kapitał i źródła jego pozyskiwania dla przedsiębiorstw i regionów*. Bielsko-Biała: Wyższa Szkoła Bankowości i Finansów 2005, pp. 297-305; Wołowiec T.: *Ocena możliwości wprowadzenia podatku katastralnego w Polsce*.

## Characteristic features of cadastral value

The characteristic features affecting the cadastral value of the first group include: location, purpose assigned in the local spatial development plan, and in case there is no plan – the way it is used, technical infrastructure, degree of development, soil class of the land if it was determined in the real estate cadastre. Characteristic features influencing the cadastral value of buildings also comprise: location, type of building, how it is used, what internal installations it has, technical data as defined in the provisions on the real estate cadastre, degree of wear and tear. On the other hand, the features of flats/premises affecting their cadastral value are: location in the building, type of flat, how it is used, what internal installations it has and its degree of wear and tear<sup>7</sup>.

Advantages of the implementation of cadastral tax (ad valorem):

- consolidating (expanding) the income base for territorial self-government units;
- clarifying the issues of ownership of property (for example positive influence on safe of property trade);
- limiting the so-called grey zone of local taxes;
- an impulse to developing property not used yet (including communal property);
- is socially justified (owners of more expensive properties pay a proportionally higher tax);
- positive influence on wealth distribution in the society (more proportional distribution of tax burden);
- limiting speculative investment in real estate.

Disadvantages of the introduction of cadastral tax (ad valorem):

- it is expensive to introduce (for example the necessity of building an integrated system of information on properties);
- it requires completing and ordering data in the register of land and buildings and in the land and mortgage register;
- possible increase in costs of rental and use of the property;
- it may be seen as socially unfair (size of tax burden does not depend on the taxpayer's income);
- weakening the tendencies of some owners to renovate and modernize

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„Biuletyn Informacyjny Stowarzyszenia Gmin Uzdrowiskowych RP”, 2007, no 2., pp. 52 – 65.

<sup>7</sup> Compare: Grycuk A.: *Zalety i wady wprowadzenia w Polsce podatku katastralnego / in: Uwarunkowania rozwoju rynku nieruchomości w Polsce*. Warszawa: Instytut Funkcjonowania Gospodarki Narodowej SGH, 2000, pp. 196-207.

the property since its value may grow (and consequently, the amount of due tax);

- the risk of deepening disproportions between poor and rich communes (differences between the taxation base values).

### Concept of reform according of Ministry of Finance

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The draft of the property tax reform according to the Ministry of Finance<sup>8</sup>.

**Taxation subject.** Tax will cover property owners, or – in case of the perpetual usufruct of the property belonging to the Treasury – users holding the property.

**Taxation object.** All properties classified according to the civil code provisions: land, buildings and other structures erected on the ground and permanently fixed to it. For the purposes of cadastral tax, non-agricultural and non-forest properties will be differentiated depending on their purpose, into properties serving economic purposes, properties serving personal needs (residential or public) and properties for rent.

**Taxation base.** Taxation base is to constitute some percentage of the value of property determined in accordance with the provisions of the act on property cadastre. The above value is determined via **capital-based method** – according to its current value. In case of buildings for rent, it is postulated to determine the value based on rent value – that is according to the income of the property, that is real or hypothetical rent.

**Tax rates.** Tax rates will be differentiated depending on the type (purpose) of the property. The level of tax rates would be determined by the commune council, within limits determined by the act. The Ministry of Finance preliminary assumption is that the cadastral tax rates should be from 0.1% (residential buildings) to not more than 2% (buildings related to conducted business activity) of the property value per year. To compare – in western Europe property owners pay cadastral tax in the amount of between 0.5% and 1.8% of the property value annually.

**Tax exemptions.** The commune council would be entitled to use tax reliefs and exemptions, while maintaining the obligation to calculate tax for the purposes of the compensation subsidy system. There is also another group of exemptions from taxation, lying in the competencies of the Polish Parliament, concerning investment reliefs or indefinite exemption of the property related to the defense. Properties owned by communes would remain exempted from taxation. Capital value of the property may be determined on the basis of the property market value, book value determined

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<sup>8</sup> Ministry of Finance: Poland (website).

for depreciation purposes, and valuation assessment. The capital method is used in the USA, Germany, Japan, the Netherlands, Latin American countries and Turkey.

### **The reasons for reforming the property taxation system.**

Before analyzing the main reasons for reforming the property taxation system in Poland we need to establish the meaning in which the concept of “system” will be used in this publication. It is necessary due to the fact that we may have justified doubts whether there is any “system” of property taxation in Poland at all<sup>9</sup>. This concept will mean a set of taxes valid at the same time in Poland, whose subject is related to holding a property. The keynote for this system – that is the factor combining these taxes into the whole is that the obligation to pay these taxes is connected with the fact possessing and using a property. Such understanding of the “system” does not determine whether it constitutes an orderly whole, is internally non-contradictory, has pre-determined goals, etc. These internal features of a rational system are not taken into account when determining what taxes are included in the system of property taxation; they will serve though as criteria for its evaluation<sup>10</sup>.

The property taxation system, as understood above, is built of three taxes at present, namely: property, agricultural and forest taxes. Property tax is defined in the Act of 12<sup>th</sup> January on taxes and local fees, agricultural tax – in the act of 15<sup>th</sup> November 1984 on agriculture tax, while the forest tax – in the act of 28<sup>th</sup> September 1991 on forests. The current property taxation system is made of three taxes of very similar objects, broadly understood as property. It is assumed that property tax has the widest object scope, as it places burden on land and buildings. The object of agricultural and forest taxes is only land. These performances, according to the rule differentiating their scope, included in Article 3 of the act on local taxes and fees, are supposed to complement each other so that land covered by agricultural or forest tax is not subject to property taxation, unless it is used for conducting other than agricultural or forest activities. These taxes, as emphasized in specialist literature, “are competitive to each other, since depending on

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<sup>9</sup> See: Wołowiec T.: *Kierunki reform systemu opodatkowania nieruchomości w Polsce*. „Samorząd Terytorialny”, 2005, no 9. pp. 39 – 49; Wołowiec T.: *Jak reformować polski system podatkowy – mity i fakty*. „Przegląd Organizacji” 2005 no 9, pp. 28 – 31.

<sup>10</sup> Etel L.: *Reforma opodatkowania nieruchomości*, Raport No 155, Biuro Analiz Sejmowych, Warszawa 2004.

the use of the property for agricultural, forest, residential or business purposes, it may be covered with one of these three taxes<sup>11</sup>.” In spite of the existence of the above rule separating these taxes, they overlap both as far as the subject and object of taxation are concerned. The co-existence of these three performances when taxing properties gives rise to numerous problems in both theory and practice. However, this is not the main reason for reforming the property taxation system. The most important reasons are listed below<sup>12</sup>:

1. It is a typical historical system, shaped not on the basis of arbitrarily adopted assumptions but by continuous adjustment of its particular elements – taxes – to the changing social and economic situation. In fact, for the past few decades the same rules regulating the agricultural and forest tax have been used, subject only to modifications, and never thoroughly reformed.<sup>13</sup>

2. This system is not adjusted to those operating in the European Union, dominated by systems based on taxable properties cadastre. The Polish system of registering and taxing properties has been severely criticized by EU experts, who emphasized the necessity of its reform. The creation of the cadastre and related property taxation system is one of the basic conditions of Poland’s membership in the European Union, where such solutions are used in nearly all countries. The European Communities place special significance to the issue of cadastre, which is reflected in obliging those member states which have not had such system, to implement it. The work on the cadastre system was taken up practically in all Central European countries applying for EU membership<sup>14</sup>.

3. It is an obsolete system, based on taxing the area of the property (buildings and land), only slightly reflecting value as the taxation base (buildings). The assets in these taxes are valued for the taxation purposes in square meters and hectares (conversion and physical), not in money. In the structural evolution of taxes comprising the property taxation system we can discern a visible trend consisting in moving away from the taxation of income (agricultural tax) and property value (property tax) and towards taxation of property area.

4. In fact there is no uniform and credible register allowing proper calculation

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<sup>11</sup> Mastalski R.: *Prawo podatkowe II – część szczegółowa*, PWN, Warszawa 1996, p. 229.

<sup>12</sup> Etel L.: *Reforma opodatkowania nieruchomości*, op. cit.

<sup>13</sup> Wołowiec T.: *Ocena możliwości wprowadzenia podatku katastralnego w Polsce*. „Biuletyn Informacyjny Stowarzyszenia Gmin Uzdrowiskowych RP”, 2007, no 2, pp. 52 – 65.

<sup>14</sup> Wołowiec T., Soboń J.: *Decentralizacja, rozwój lokalny i gospodarka finansowa jednostek samorządu terytorialnego*. Nowy Sącz Wyższa Szkoła Biznesu – National-Louis University 2010, pp. 214.

of taxes imposed on the property. The area being the taxation base is supposed to be derived from the register of land and buildings. In reality, though, there is only the register of land, whereas the evidence of buildings is still waiting to be created.<sup>19</sup> Therefore the building taxation base is determined on the basis of physical measurements. Forests and forest ground are taxed on the basis of physical data resulting from the forest development plans or simplified forest development plans, whose credibility, due to the lack of updates is also far from perfect.

5. It is a system which does not bring any expected income for local budgets. This is mostly attributed to the fact that buildings, constructions and the so-called construction objects which are not permanently joined to the ground are covered by any register, and so tax bodies of communes find it extremely difficult to determine which of these objects have not been registered for taxation. Another reason for low fiscal productivity is due to the fact that there are very high and in many cases, unjustified differences in the level of particular taxes imposed on property. Preferential taxation of agricultural and forest property compared to other types of real estate, accounts for the escape of taxpayers from paying taxes on property and choosing to pay agricultural tax, which is very easy in the present system.

6. Taxes comprising this system, even though they are becoming performances similar in type due to the implemented changes, still demonstrate certain heterogeneity of their construction. Further changes to the agricultural tax and property tax have transformed these performances from revenue (agricultural tax) and revenue-capital (property tax) into capital types of taxes, with some typical elements of revenue taxes.

7. The current system does not solve the problems of agriculture taxation, including taxation of agricultural real estate. At present taxes imposed on properties, especially agricultural tax, are the only performances burdening farm owners (not counting incomes from special sections of agricultural production). Since that professional group does not pay taxes on revenue or income obtained from conducting agricultural activity, attempts are made at making the agricultural tax a revenue-income-capital tax. This is obviously some fiction, negatively affecting the shape of agricultural tax, which is manifested, for example, in the concept of conversion hectare. Whether it is used to determine the revenue capacity, income capacity or the area of a farm, it is hard to say.

8. In spite of appearances, the structure of these taxes may be shaped by communes only to a small extent. For no apparent reason the scope of the power given to the council differs for particular taxes.

## The main directions of the property taxation system reforms

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The above drawbacks of the valid system of property taxation seem to call for the necessity of taking quick action aimed at reforming it. Some of them can only be removed by thoroughly reforming the property taxation system, aimed at introducing the cadastre system and the tax on property value based on it. The implementation of the fundamental reconstruction of the current system of registering and taxing properties requires quite a long period of time. This is mainly connected with the necessity of establishing the real estate cadastre and conducting common taxation in order to determine the cadastral value of properties. It is assumed that a fiscal cadastre may be introduced in a couple of years, at the earliest, and if it is going to be a multi-purpose cadastre, this period will be significantly prolonged.<sup>15</sup>

However, many of the above-signaled drawbacks of the current property taxation system may be eliminated without the need to wait for the cadastre. Even now, within the first stage of the reform, actions can be taken aiming at improving the existing regulations, which should either strive at removing or modifying those provisions which generate problems at the stage of collecting taxes imposed on real estate and adjusting the existing norms to the assumptions of the designed cadastral tax. Among detailed actions that should be implemented in the first stage of the reform one could mention:

1. Standardizing the structure of three taxes imposed on the land, which especially concerns the statutory definition of the tax object, exemptions and reliefs, properties exempted from taxation, competencies of self-government bodies in shaping some of their elements and the mode and terms of payment. Also terminology used in provisions of the acts regulating taxes should be standardized. Taking up these activities will make it easier in the future to impose one cadastral tax on all land property.

2. Eliminating significant differences in the amount of tax burden imposed on particular types of property. Activities here should be aimed at making tax burden real, especially in case of agriculture land and forests, by gradually increasing the amount of agriculture and forest tax (eliminating some exemptions and reliefs, increasing the tax rate). Also the differences in the amount of taxation within particular taxes should be decreased (for example between residential and other buildings, forests with forest development plans and those which are taxed on the basis of the register of land, etc.). Relative standardization of the level of particular taxes will eliminate

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<sup>15</sup> Wołowiec T.: *Zasady stosowania podatku od nieruchomości*. „*Ekonomika i Organizacja Przedsiębiorstwa*” 2003 no 4, pp. 41 – 49.



the phenomenon of dodging property taxes and will alleviate the effects of covering agriculture and forest lands with cadastral tax<sup>16</sup>.

3. Using the depreciation value as the taxation base not only to constructions, but to all objects subjected to statutory depreciation. In this way most buildings and constructions not fixed permanently to the ground and used for conducting economic activity would be taxed on principles characteristic for cadastral taxes.

4. Introducing a provision which would precisely differentiate the object scope of these three taxes. The best idea would be to write down in the act on agriculture and forest tax that the land covered with the provisions of this act includes the taxable land, the land exempted from these taxes and the land not covered by these taxes by the virtue of the above acts. This will help clearly isolate the object scope of these three performances and will limit the phenomenon of avoiding to pay property taxes<sup>17</sup>.

5. Making entries in the land register real, establishing the register of buildings and clearly stating in the three acts regulating property taxation that the taxes are calculated on the basis of data arising from the above registers. This will standardize the principles of determining the area of the taxable property, facilitate calculation of taxes and contribute to revealing properties which have not been declared for taxation. Data included in these types of registers will undoubtedly be used when establishing the property cadastre.

6. Removing “dead” provisions from the acts, that is provisions which are no longer used or do not perform the assumed function (for example the right of the province governor to move communes to another tax region, preference treatment of land in case of only one group of the retired people – those who belong to a cooperative, etc.).

7. Increasing the rights of self-government bodies in shaping the structure of these taxes by, for example, adopting the principle that rates in agriculture, forest and property taxes may be decreased and differentiated by the commune council without any restrictions. Minimal rates should not be used, as – which is confirmed in practice – do not perform any function in the current system. The commune council should also be authorized to introduce not only exemptions but also reliefs in all three taxes. This

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<sup>16</sup> Wołowiec T.: *Planowana reforma modelu opodatkowania nieruchomości w Polsce – implikacje dla zakładów opieki zdrowotnej*, „Antidotum zarządzanie w opiece zdrowotnej 2003 no 12, pp. 13 – 30.

<sup>17</sup> Wołowiec T.: *Kierunki reform polskiego systemu podatkowego jako ważnego elementu otoczenia zewnętrznego zakładu opieki zdrowotnej*. „Antidotum zarządzanie w opiece zdrowotnej, 2004 no 7, pp. 25 – 41.

competence of the council should be statutorily limited, due to Article 217 of the Constitution, only to object exemptions. Granting such rights to the commune council is a manifestation of the implementation of the principle of increasing the local government rights and the constitution guaranteed right to determine the level of local taxes and fees. Accomplishing the first stage of the reform will make it more probable to achieve social acceptance for implementing fundamental changes in the system of property taxation. The evolutionary transformation of the tax “on the surface” into the tax “on the value” of the property will, as can be supposed, alleviate the taxpayers’ fears concerning possible effects of introducing the cadastral tax. Extending the circle of entities obliged to pay the tax on property value, within the existing regulations, will decrease the natural resistance of taxpayers against accepting new principles of property taxation. Such effect cannot be achieved by introducing, and omitting the transitory period, new, totally different regulations, addressed at a very wide circle of potential taxpayers used to the valid principles of paying tax on property<sup>18</sup>.

## Conclusions

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The gradual implementation of the property taxation reform is also supported by the fact that in practice its success will significantly depend on the efficiency of the operations of self-government tax bodies. Employees of these bodies (especially treasurers) do not always have proper education allowing them to acquaint with new regulations concerning the process of property tax collection quickly and independently. We should bear in mind that in practice the first problems encountered with switching to the new principles of property taxation will be solved by these people. Their competencies will determine the efficiency of the implementation of new provisions. This favors the gradual adjustment of the valid regulations wherever possible, to the designed cadastral tax. It will enable us to ‘test’ in practice some of them in the system of property tax and will allow the employees of tax calculation organs of local governments to acquaint with it. The accomplishment of the first stage of the reform will enable us to perfect the valid legal provisions and to eliminate those which generate problems. It is of particular importance in a situation when the structure of some elements of the new tax will be based, as it should be postulated, on provisions of

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<sup>18</sup> See: Wołowiec T.: *Wybrane zagadnienia opodatkowania nieruchomości związanych z udzielaniem świadczeń zdrowotnych*. „Antidotum zarządzanie w opiece zdrowotnej”, 2004 no 1. pp. 11 – 17.

law included in the current acts. The norms concerning such tax elements as its subject, object, exemptions or mode of payment, after introducing some corrections, may be moved to the cadastral tax. The introduction of these corrections and their practical verification on the basis of the 'old' tax will contribute to their problem-free operation in cadastral tax.

There is one more reason for the implementation of the reform, a reason we have already mentioned many times. The efficient operation of the new tax is determined by the creation of the cadastral system and conducting common taxation of properties. This tax, apart from other conditions, will function well if the cadastre performs its functions. This can only be checked empirically by observing how this institution functions for some time. If it turns out that it performs its functions, we can base the property taxation system on it. However, if for some reasons, the functioning of the cadastre does not go in line with the assumptions of its creators, we cannot relate a new property tax to it. Therefore it seems that it is not justifiable to introduce the cadastre and the cadastral tax simultaneously. In the first stage of the reform we should practically verify how the new solutions concerning property valuation and cadastre work and then – after successful verification – start the second stage consisting in implementing the cadastral tax.

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