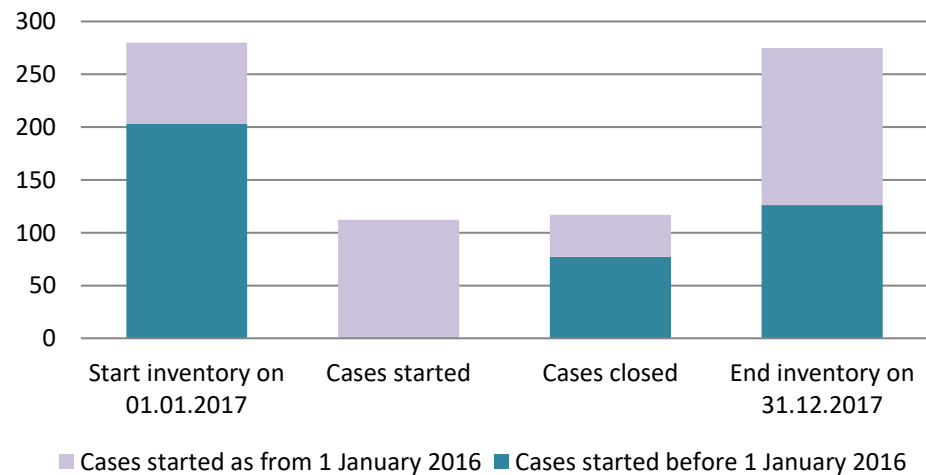


Spain

Total MAP Caseload



Cases started before 1 January 2016	2017 start inventory	Cases started	Cases closed	2017 end inventory
Transfer pricing cases	143	0	64	79
Other cases	60	0	13	47

Cases started as from 1 January 2016	2017 start inventory	Cases started	Cases closed	2017 end inventory
Transfer pricing cases	53	55	16	92
Other cases	24	57	24	57

Average time needed to close MAP cases (in months)

Cases started before 1 January 2016	Average time
Transfer pricing cases	39.82
Other cases	31.68

Note: the average time taken to close MAP cases that started before 1 January 2016 was computed by applying the following rules:

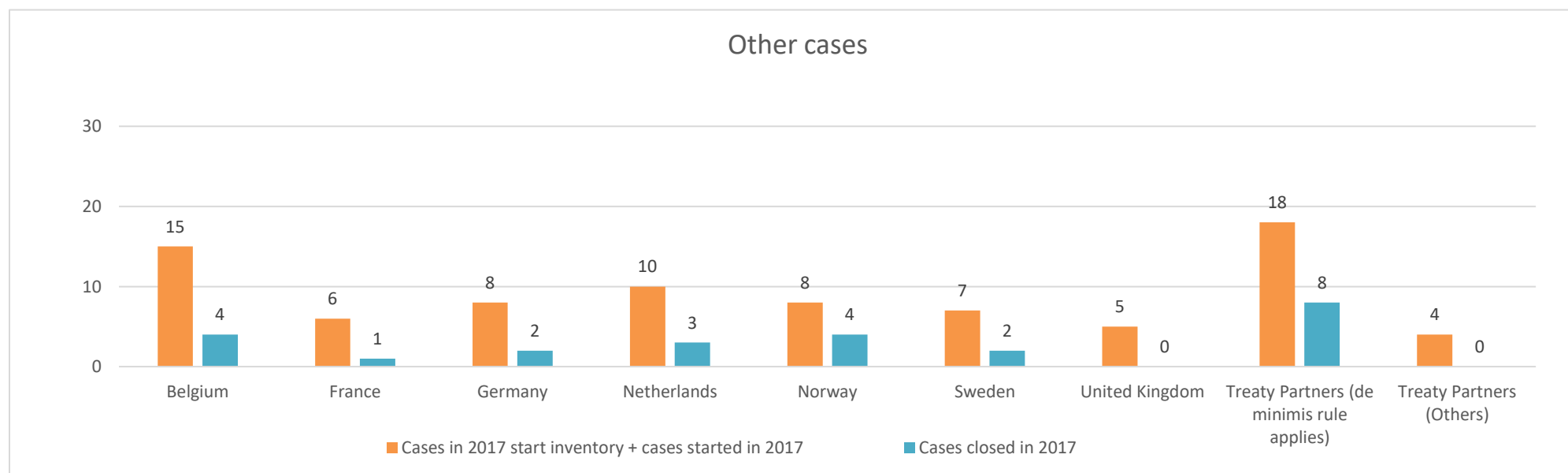
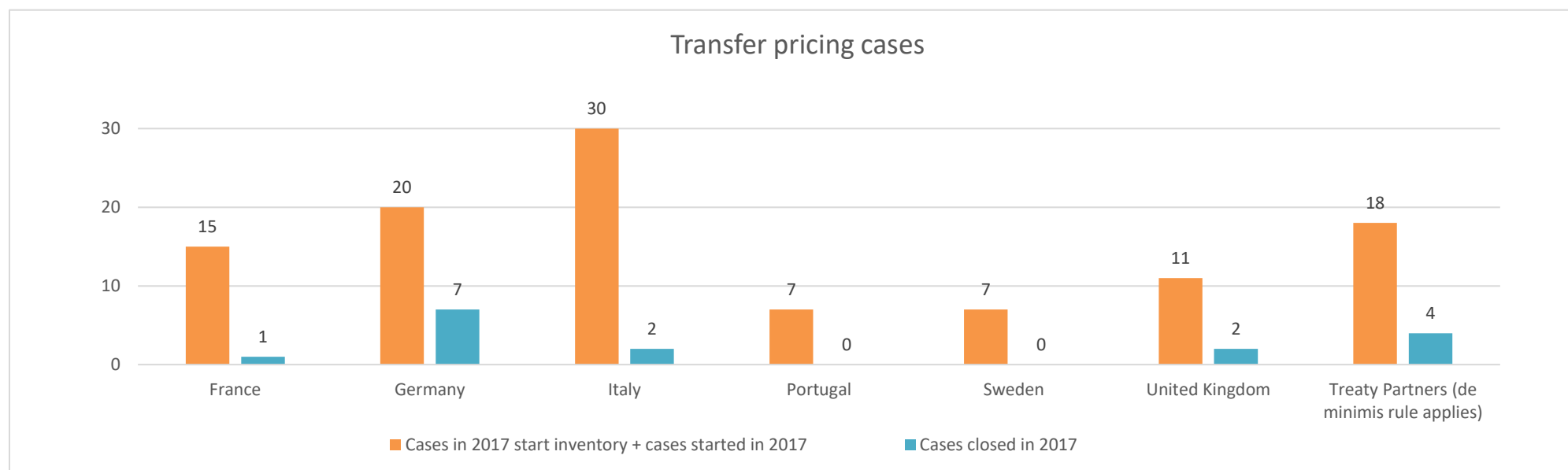
- (i) start date: the date its competent authority received a complete MAP request; and
- (ii) end date: the date when the taxpayer accepted the MAP agreement, or differently, the date of closure of the case in case no agreement was reached, or the date when the taxpayer withdrew its MAP request.

Cases started as from 1 January 2016	Start to End	Receipt to Start	Start to Milestone 1	Milestone 1 to End
Transfer pricing cases	12.82	2.36	6.06	6.86
Other cases	5.13	1.98	1.43	4.92

Note: the average times to close MAP cases that started as from 1 January 2016 were computed according to the MAP statistics reporting framework available at <http://www.oecd.org/tax/dispute/mutual-agreement-procedure-statistics-reporting-framework.pdf>

Overview of MAP partners (only for cases started as from 1 January 2016)

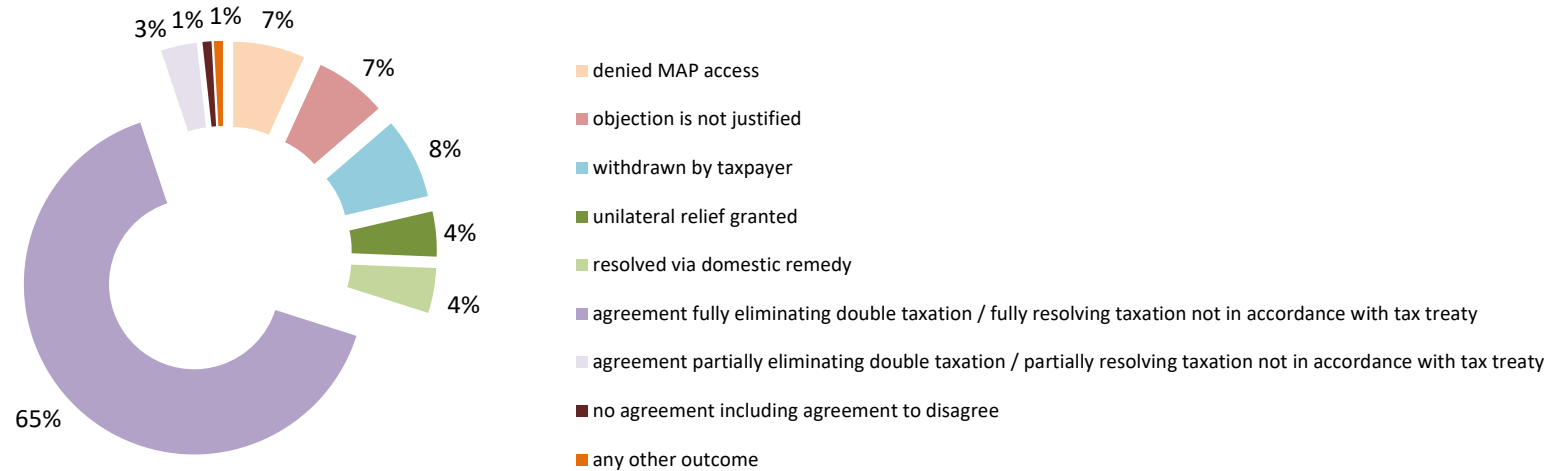
Note: the MAP cases started before 1 January 2016 and closed in 2017 are not shown in these graphs



The label "Treaty Partners (de minimis rule applies)" applies to treaty partners with which the number of cases in start inventory plus the number of cases started is at least 5. The relevant MAP statistics are aggregated under this category.

The label "Treaty Partners (Others)" applies to treaty partners that are not reporting MAP statistics for the reporting period. The relevant MAP statistics are aggregated under this category.

MAP Outcomes



Cases closed by outcome	denied MAP access	objection is not justified	withdrawn by taxpayer	unilateral relief granted	resolved via domestic remedy	agreement fully eliminating double taxation / fully resolving taxation not in accordance with tax treaty	agreement partially eliminating double taxation / partially resolving taxation not in accordance with tax treaty	agreement that there is no taxation not in accordance with tax treaty	no agreement including agreement to disagree	any other outcome	Total
Transfer pricing cases (all)	3	1	6	1	2	62	4	0	1	0	80
Cases started before 1 January 2016	0	1	4	0	2	53	4	0	0	0	64
Cases started as from 1 January 2016	3	0	2	1	0	9	0	0	1	0	16
Other cases (all)	5	7	3	4	3	14	0	0	0	1	37
Cases started before 1 January 2016	0	0	2	0	0	11	0	0	0	0	13
Cases started as from 1 January 2016	5	7	1	4	3	3	0	0	0	1	24
All cases	8	8	9	5	5	76	4	0	1	1	117

Annex A

MAP Statistics Reporting for the 2017 Reporting Period (1 January 2017 to 31 December 2017) for Pre-2016 Cases

category of cases	no. of pre-2016 cases in MAP inventory on 1 January 2017	number of pre-2016 cases closed during the reporting period by outcome:										no. of pre-2016 cases remaining in on MAP inventory on 31 December 2017	average time taken (in months) for closing pre-2016 cases during the reporting period
		denied MAP access	objection is not justified	withdrawn by taxpayer	unilateral relief granted	resolved via domestic remedy	agreement fully eliminating double taxation / fully resolving taxation not in accordance with tax treaty	agreement partially eliminating double taxation / partially resolving taxation not in accordance with tax treaty	agreement that there is no taxation not in accordance with tax treaty	no agreement including agreement to disagree	any other outcome		
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11	Column 12	Column 13	Column 14
Row 1 Attribution/ Allocation	143	0	1	4	0	2	53	4	0	0	0	79	39.82
Row 2 Others	60	0	0	2	0	0	11	0	0	0	0	47	31.68
Row 3 Total	203	0	1	6	0	2	64	4	0	0	0	126	38.45
<p>Notes:</p> <p>1) The average time taken to close pre-2016 cases was computed by applying the following rules: (i) start date: the date its competent authority received a complete MAP request; and (ii) end date: the date when the taxpayer accepted the MAP agreement, or differently, the date of closure of the case in case no agreement was reached, or the date when the taxpayer withdrew its MAP request.</p> <p>2) The mismatches between number of cases remaining in MAP inventory on 31 December 2016 and number of cases in MAP inventory on 1 January 2017 are due to the classification of MAP cases as protective after the deadline to report 2016 OECD statistics or the matches between countries about the start date after the deadline to report 2016 OECD statistics</p>													

Annex B
MAP Statistics Reporting for the 2017 Reporting Period (1 January 2017 to 31 December 2017) for Post-2015 Cases

Table 1: Attribution / Allocation MAP Cases														
Treaty Partner	no. of post-2015 cases in MAP inventory on 1 January 2017	no. of post-2015 cases started during the reporting period	number of post-2015 cases closed during the reporting period by outcome:										no. of post-2015 cases remaining in MAP inventory on 31 December 2017	
			denied MAP access	objection is not justified	withdrawn by taxpayer	unilateral relief granted	resolved via domestic remedy	agreement fully eliminating double taxation / fully resolving taxation not in accordance with tax treaty	agreement partially eliminating double taxation / partially resolving taxation not in accordance with tax treaty	agreement that there is no taxation not in accordance with tax treaty	no agreement including agreement to disagree	any other outcome		
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11	Column 12	Column 13	Column 14	
Row 1	France	3	12	0	0	0	1	0	0	0	0	0	0	14
	Germany	9	11	2	0	1	0	0	4	0	0	0	0	13
	Italy	18	12	1	0	1	0	0	0	0	0	0	0	28
	Portugal	3	4	0	0	0	0	0	0	0	0	0	0	7
	Sweden	6	1	0	0	0	0	0	0	0	0	0	0	7
	United Kingdom	2	9	0	0	0	0	0	2	0	0	0	0	9
Row 2	Treaty Partners (<i>de minimis</i> rule applies)	12	6	0	0	0	0	0	3	0	0	1	0	14
Row 3	Treaty Partners (Others)	0	0	0	0	0	0	0	0	0	0	0	0	0
	Total	53	55	3	0	2	1	0	9	0	0	1	0	92
<p><u>Notes</u> The mismatches between number of cases remaining in MAP inventory on 31 December 2016 and number of cases in MAP inventory on 1 January 2017 are due to the classification of MAP cases as Protective after the deadline to report 2016 OECD statistics or the matches between countries about the start date after the deadline to report 2016 OECD statistics</p>														

Table 2: Other MAP Cases													
Treaty Partner	no. of post-2015 cases in MAP inventory on 1 January 2017	no. of post-2015 cases started during the reporting period	number of post-2015 cases closed during the reporting period by outcome										no. of post-2015 cases remaining in MAP inventory on 31 December 2017
			denied MAP access	objection is not justified	withdrawn by taxpayer	unilateral relief granted	resolved via domestic remedy	agreement fully eliminating double taxation / fully resolving taxation not in accordance with tax treaty	agreement partially eliminating double taxation / partially resolving taxation not in accordance with tax treaty	agreement that there is no taxation not in accordance with tax treaty	no agreement including agreement to disagree	any other outcome	
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11	Column 12	Column 13	Column 14
Row 1	Belgium	1	14	0	1	0	3	0	0	0	0	0	11
	France	3	3	1	0	0	0	0	0	0	0	0	5
	Germany	2	6	0	0	0	1	1	0	0	0	0	6
	Netherlands	2	8	1	1	0	0	0	1	0	0	0	7
	Norway	4	4	1	1	0	0	2	0	0	0	0	4
	Sweden	3	4	0	0	1	0	0	1	0	0	0	5
	United Kingdom	2	3	0	0	0	0	0	0	0	0	0	5
Row 2	Treaty Partners (<i>de minimis</i> rule applies)	6	12	2	4	0	0	0	1	0	0	1	10
Row 3	Treaty Partners (Others)	1	3	0	0	0	0	0	0	0	0	0	4
	Total	24	57	5	7	1	4	3	3	0	0	1	57
	Notes:												

Annex B

MAP Statistics Reporting for the 2017 Reporting Period (1 January 2017 to 31 December 2017) for Post-2015 Cases

Table 1: Attribution / Allocation MAP Cases					
Treaty Partner	average time taken (in months) for post-2015 cases from:				
	"Start" to "End"	Receipt of taxpayer's MAP request to "Start"	"Start" to Milestone 1	Milestone 1 to "End"	
Column 1	Column 2	Column 3	Column 4	Column 5	
Row 1	France	15.22	1.15		
	Germany	12.22	3.61	5.67	6.35
	Italy	12.03	1.04		
	United Kingdom	12.81	1.78	8.19	4.62
Row 2	Treaty Partners (de minimis rule applies)	13.65	1.44	5.29	8.36
Row 3	Treaty Partners (Others)				
	Total Average Time	12.82	2.36	6.06	6.86
<u>Notes:</u>					

Annex B

MAP Statistics Reporting for the 2017 Reporting Period (1 January 2017 to 31 December 2017) for Post-2015 Cases

Table 2: Other MAP Cases					
Treaty Partner	average time taken (in months) for post-2015 cases from:				
	"Start" to "End"	Receipt of taxpayer's MAP request to "Start"	"Start" to Milestone 1	Milestone 1 to "End"	
Column 1	Column 2	Column 3	Column 4	Column 5	
Row 1	Belgium	1.28	1.05		
	France	4.18	1.15		
	Germany	1.30	11.44		
	Netherlands	4.69	1.15	1.12	3.57
	Norway	8.22	1.08	2.97	5.76
	Sweden	5.05	1.25	0.00	10.09
Row 2	Treaty Partners (<i>de minimis</i> rule applies)	6.78	1.14	0.31	3.10
Row 3	Treaty Partners (Others)				
	Total Average Time	5.13	1.98	1.43	4.92
<u>Notes:</u>					

Annex B

MAP Statistics Reporting for the 2017 Reporting Period (1 January 2017 to 31 December 2017) for Post-2015 Cases

Table 3: All MAP Cases					
average time taken (in months) for post-2015 cases from:					
	"Start" to "End"	Receipt of taxpayer's MAP request to "Start"	"Start" to Milestone 1	Milestone 1 to "End"	
	Column 1	Column 2	Column 3	Column 4	
Row 1	Total Average Time	8.21	2.14	3.75	5.89
Notes:					