

## MAP PROGRAM STATISTICS FOR THE 2012 REPORTING PERIOD

Country: **Canada/Canada**

If the reporting period does not correspond to the calendar year, please indicate the date when the reporting period ends: **March 31, 2012**

Year MAP Case was Initiated	Opening Inventory on First Day of Reporting Period		Initiated During Reporting Period		Completed During Reporting Period		Ending Inventory on Last Day of Reporting Period		Closed or Withdrawn with Double Taxation During Reporting Period		Average Cycle Time for Cases Completed, Closed or Withdrawn During Reporting Period (in months)	
	OECD	non-OECD	OECD	non-OECD	OECD	non-OECD	OECD	non-OECD	OECD	non-OECD	OECD	non-OECD
<b>2006 or prior</b>	4	1			1	0	1	0	2	1	74.72	74.30
<b>2007</b>	9	0			7	0	2	0	0	0	52.66	0
<b>2008</b>	19	1			10	1	7	0	2	0	43.10	45.44
<b>2009</b>	29	1			17	1	11	0	1	0	35.52	32.98
<b>2010</b>	71	2			27	1	44	1	0	0	24.75	25.38
<b>2011(*)</b>	93	2			18	0	75	2	0	0	15.10	0
<b>2012</b>			86	1	5	1	79	0	2	0	4.17	1.30
<b>Total</b>	<b>225</b>	<b>7</b>	<b>86</b>	<b>1</b>	<b>85</b>	<b>4</b>	<b>219</b>	<b>3</b>	<b>7</b>	<b>1</b>	<b>30.49</b>	<b>35.88</b>

(\*) The opening inventory was restated (as compared to the ending inventory in the MAP PROGRAM STATISTICS FOR 2011 REPORTING PERIOD (2011 Report) to reflect a change in status from “protective filing” to “initiated”. The total ending inventory – OECD in the 2011 Report was 93 instead of 85; no change for non-OECD.

MAP cases are divided: negotiable and non-negotiable. Negotiable cases involve a request requiring discussions with another tax administration in order to resolve a treaty issue. Non-negotiable cases involve issues and agreements between the Canadian competent authority and a taxpayer, and do not involve another tax administration. For example, requests for a refund of excess withholding tax. Only negotiable MAP cases are presented in the above table. For further information about the results of the Canadian MAP program in 2011-2012, please refer to: [http://www.cra-arc.gc.ca/tx/nrsdnts/cmp/cs\\_mp-eng.html](http://www.cra-arc.gc.ca/tx/nrsdnts/cmp/cs_mp-eng.html).