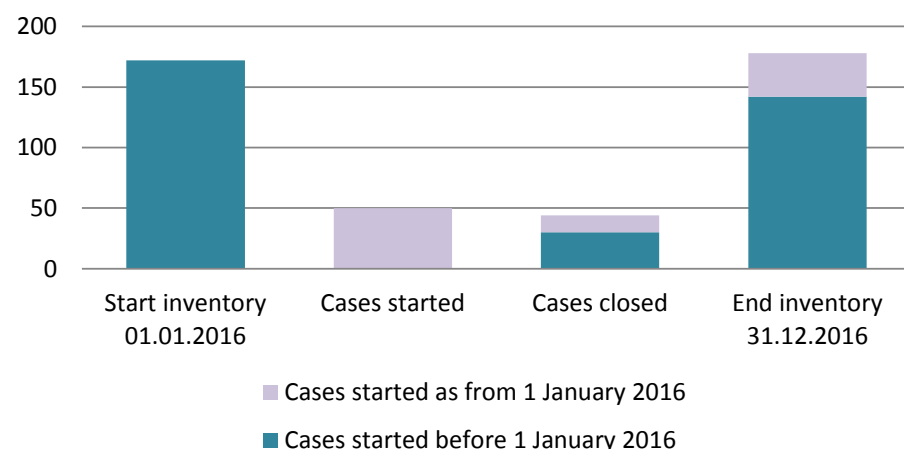


## Denmark

### Total MAP Caseload



Cases started before 1 January 2016	Start inventory	Cases started	Cases closed	End inventory
Transfer pricing cases	135	0	21	114
Other cases	37	0	9	28

16 protective MAP requests are included in start inventory and end inventory of transfer pricing cases

Cases started as from 1 January 2016	Start inventory	Cases started	Cases closed	End inventory
Transfer pricing cases	0	31	6	25
Other cases	0	19	8	11

### Average time needed to close MAP cases

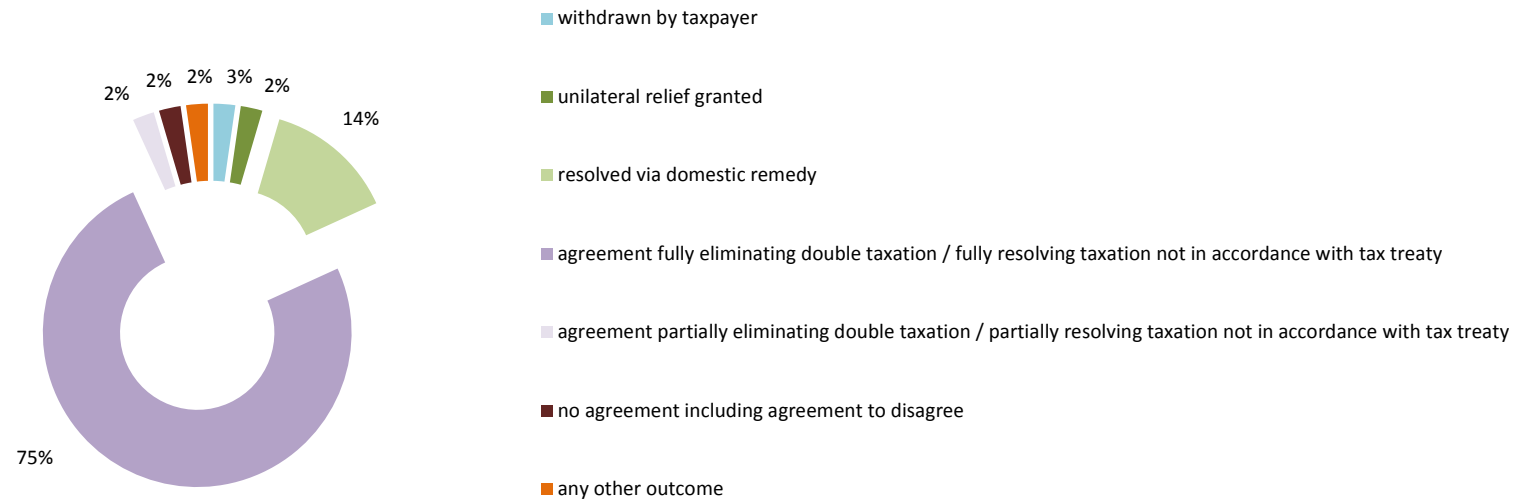
Cases started before 1 January 2016	Average time
Transfer pricing cases	30.57
Other cases	51.22

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: for transfer pricing cases, the date of the receipt of the MAP request (for cases under the EU Arbitration Convention the date of receipt of the request and the minimum information required) and for other cases the date of the first registration in the internal filing system; and  
 (ii) end date: for transfer pricing cases the date of the taxpayer's acceptance of the MAP agreement and for other cases the date of closing the case in the internal filing system.

Cases started as from 1 January 2016	Start to End	Receipt to Start	Start to Milestone 1	Milestone 1 to End
Transfer pricing cases	0.69	0.88	0.28	0.41
Other cases	2.77	1.16	0.46	2.62

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>

## 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Cases closed by outcome	denied MAP access	objection is not justified	withdrawn by taxpayer	unilateral relief granted	resolved via domestic remedy	agreement fully eliminating double taxation / fully resolving taxation not in accordance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
<b>Transfer pricing cases (all)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>25</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>27</b>
Cases started before 1 January 2016	0	0	0	1	1	19	0	0	0	0	21
Cases started as from 1 January 2016	0	0	0	0	0	6	0	0	0	0	6
<b>Other cases (all)</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>5</b>	<b>8</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>17</b>
Cases started before 1 January 2016	0	0	0	0	1	5	1	0	1	1	9
Cases started as from 1 January 2016	0	0	1	0	4	3	0	0	0	0	8
<b>All cases</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>6</b>	<b>33</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>44</b>

Note: the MAP statistics previously reported by the jurisdiction are available at <http://www.oecd.org/ctp/dispute/map-statistics-2006-2015.htm>