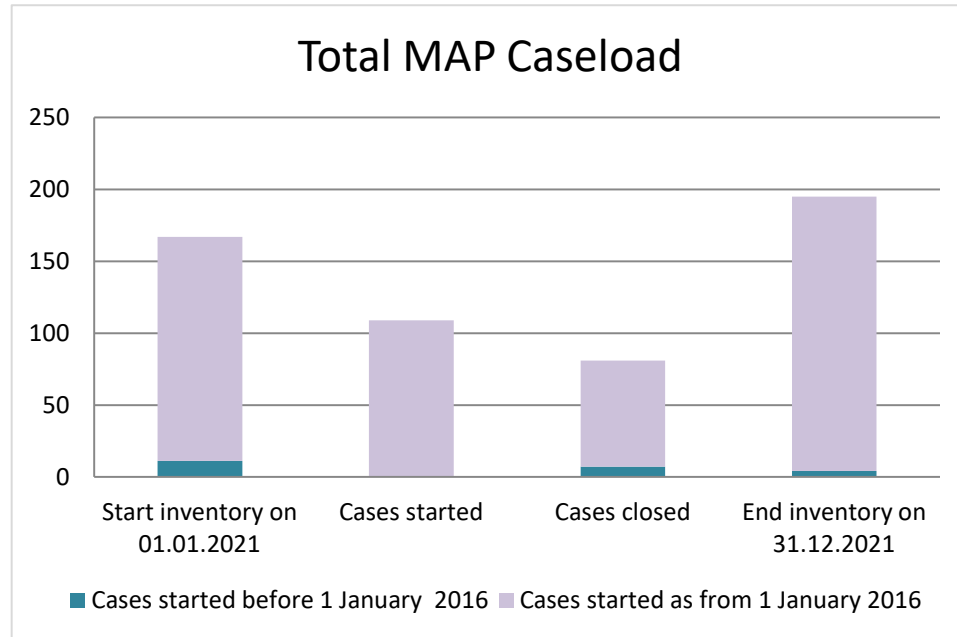


Canada



Cases started before 1 January 2016	2021 Start inventory	Cases started	Cases closed	2021 End inventory
Transfer pricing cases	6	0	4	2
Other cases	5	0	3	2

Cases started as from 1 January 2016	2021 Start inventory	Cases started	Cases closed	2021 End inventory
Transfer pricing cases	123	57	50	130
Other cases	33	52	24	61

Average time needed to close MAP cases

Cases started before 1 January 2016	Average time
Transfer pricing cases	84.86
Other cases	69.28

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

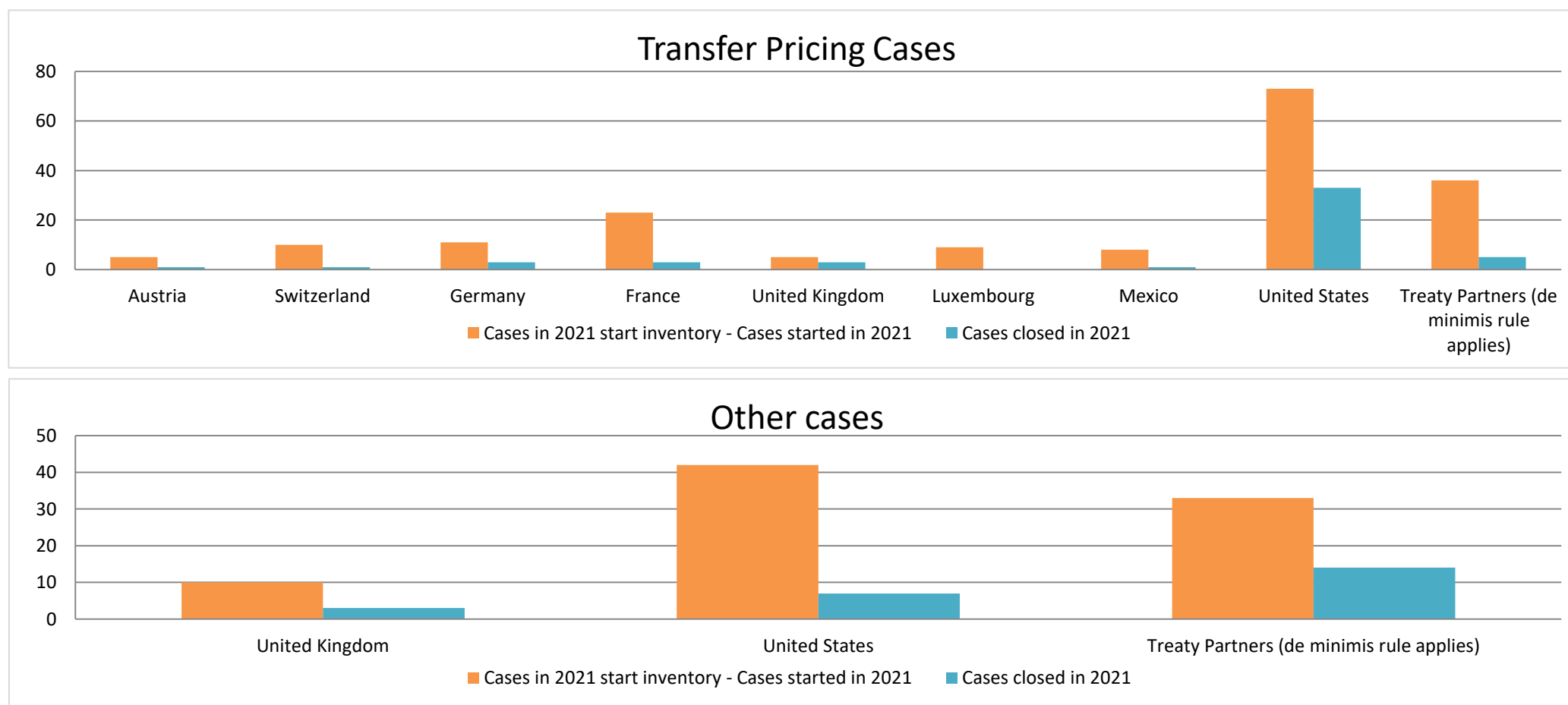
- (i) start date: the date when the MAP request was received; and
- (ii) end date: either the date of the closing letter sent to the taxpayer or the date of final closure of the case if no agreement was reached.

Cases started as from 1 January 2016	Start to End	Receipt to Start	Start to Milestone 1	Milestone 1 to End
Transfer pricing cases	20.61	1.44	9.79	13.52
Other cases	12.96	2.92	6.88	13.44

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>

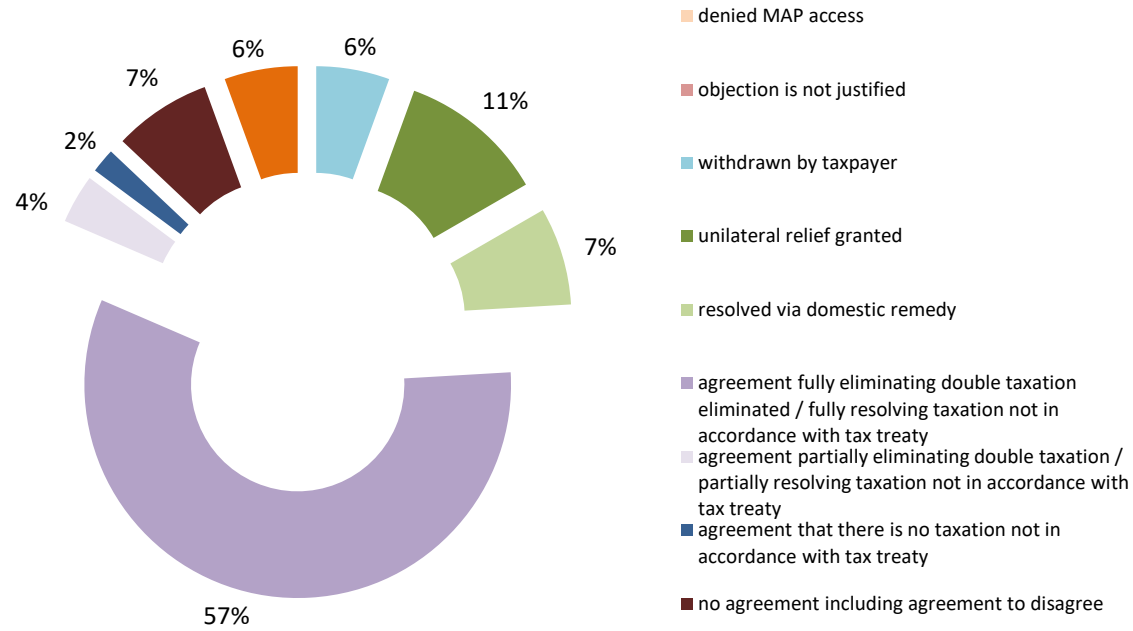
Overview of MAP partners (only for cases started as from 1 January 2016)

Note: the MAP cases started before 1 January 2016 and closed in 2021 are not shown in these graphs

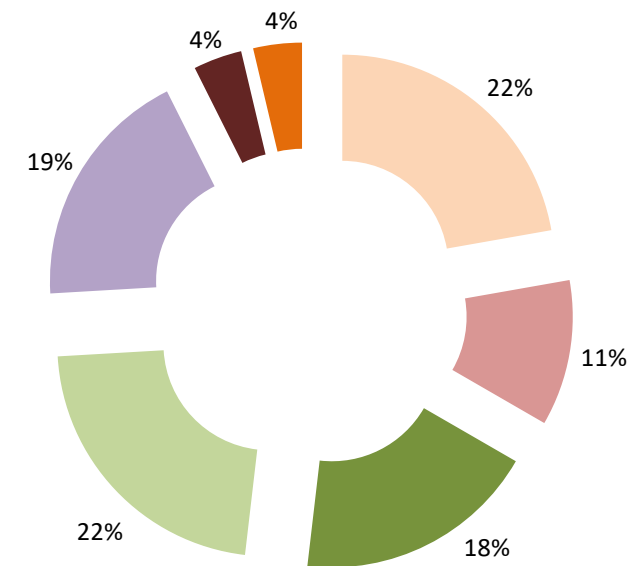


The label "Treaty Partners (de minimis rule applies)" applies to treaty partners with which the number of cases in start inventory plus the number of cases started is less than 5. The relevant MAP statistics are aggregated under this category.

MAP Outcomes - TP cases



MAP Outcomes - other cases



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 eliminated / 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)	0	0	3	6	4	31	2	1	4	3	54
Cases started before 1 January 2016	0	0	0	0	2	0	0	0	2	0	4
Cases started as from 1 January 2016	0	0	3	6	2	31	2	1	2	3	50
Other cases (all)	6	3	0	5	6	5	0	0	1	1	27
Cases started before 1 January 2016	0	0	0	0	3	0	0	0	0	0	3
Cases started as from 1 January 2016	6	3	0	5	3	5	0	0	1	1	24
All cases	6	3	3	11	10	36	2	1	5	4	81

Annex A
MAP Statistics Reporting for the 2021 Reporting Period (1 January 2021 to 31 December 2021)

category of cases	no. of pre-2016 cases in MAP inventory on 1 January 2021	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 2021	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	6	0	0	0	0	2	0	0	0	2	0	2	84.86
Row 2 Others	5	0	0	0	0	3	0	0	0	0	0	2	69.28
Row 3 Total	11	0	0	0	0	5	0	0	0	2	0	4	78.18
<p><u>Notes:</u></p> <p>Definition of a MAP case and counting of MAP cases The definitions used to by Canada to count a MAP case and how Canada counts a MAP case for Annex A are the same as the definitions set out under the MAP Statistics Reporting Framework.</p> <p>Category of cases The definition used to by Canada to categorise attribution/allocation MAP cases and other MAP cases is the same as definitions set out under the MAP Statistics Reporting Framework.</p> <p>Notes on the computation of average time The average time taken to close pre-2016 cases was computed by applying the following rules: (i) start date: the date of filing of the MAP request; and (ii) end date: the date of the closing letter sent to the taxpayer.</p>													

Table 1: Attribution / Allocation MAP Cases														
Treaty Partner	no. of post-2015 cases in MAP inventory on 1 January 2021	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 2021	
			denied MAP access	objection is not justified	withdrawn by taxpayer	unilateral relief granted	resolved via domestic remedy	agreement fully eliminating double taxation eliminated / 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	Austria	4	1	0	0	0	0	0	1	0	0	0	0	4
	Switzerland	8	2	0	0	0	0	0	1	0	0	0	0	9
	Germany	10	1	0	0	0	1	0	2	0	0	0	0	8
	France	20	3	0	0	1	1	1	0	0	0	0	0	20
	United Kingdom	3	2	0	0	0	0	0	0	0	0	0	3	2
	Luxembourg	5	4	0	0	0	0	0	0	0	0	0	0	9
	Mexico	4	4	0	0	0	0	0	1	0	0	0	0	7
	United States	45	28	0	0	1	3	1	25	2	1	0	0	40
Row 2	Treaty Partners (de minimis rule applies)	24	12	0	0	1	1	0	1	0	0	2	0	31
	Total	123	57	0	0	3	6	2	31	2	1	2	3	130
Notes:														

Table 2: Other MAP Cases														
Treaty Partner	no. of post-2015 cases in MAP inventory on 1 January 2021	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 2021	
			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	United Kingdom	3	7	1	0	0	0	0	2	0	0	0	0	7
	United States	16	26	1	2	0	2	0	1	0	0	0	1	35
Row 2	Treaty Partners (de minimis rule applies)	14	19	4	1	0	3	3	2	0	0	1	0	19
	Total	33	52	6	3	0	5	3	5	0	0	1	1	61
Notes:														

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	Austria	26.40	0.23	4.11	22.29
	Switzerland	5.33	1.15	n.a.	n.a.
	Germany	33.90	2.48	12.11	21.79
	France	31.10	1.15	12.62	1.12
	United Kingdom	32.27	1.15	0.79	31.48
	Mexico	14.62	6.81	14.87	0.00
	United States	18.05	1.30	10.45	10.06
Row 2	Treaty Partners (de minimis rule applies)	19.35	1.31	10.26	21.87
	Total	20.61	1.44	9.79	13.52
Notes:					

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 United Kingdom	12.77	4.24	1.40	15.83
United States	21.01	1.33	19.11	11.13
Row 2 Treaty Partners (de minimis rule applies)	8.98	3.44	0.45	13.98
Total	12.96	2.92	6.88	13.44
Notes:				

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	18.13	1.92	9.22	13.51
Notes:					