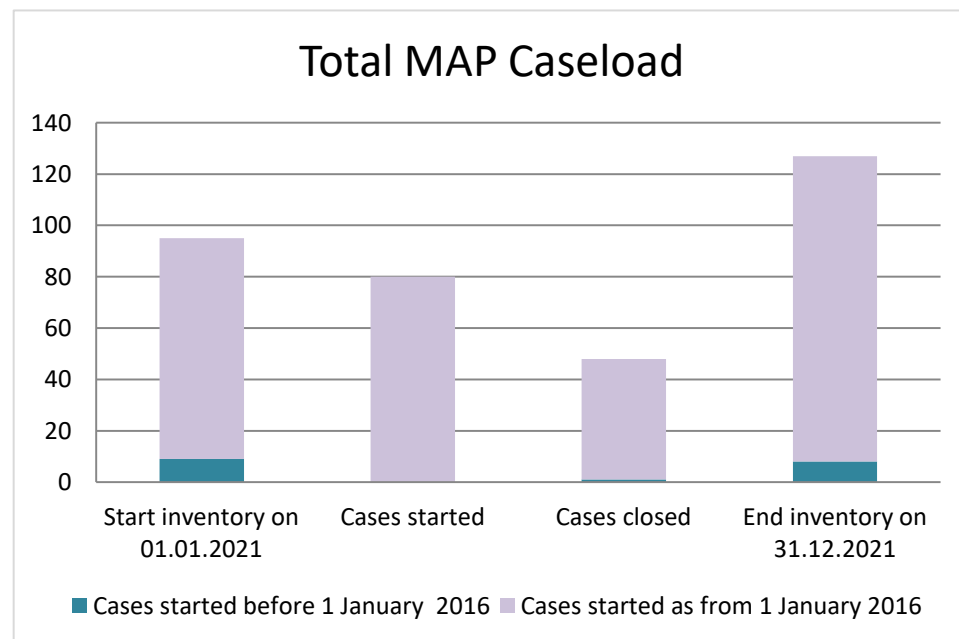


Portugal



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

Cases started as from 1 January 2016	2021 Start inventory	Cases started	Cases closed	2021 End inventory
Transfer pricing cases	42	35	17	60
Other cases	44	45	30	59

Average time needed to close MAP cases

Cases started before 1 January 2016	Average time
Transfer pricing cases	n.a.
Other cases	87.95

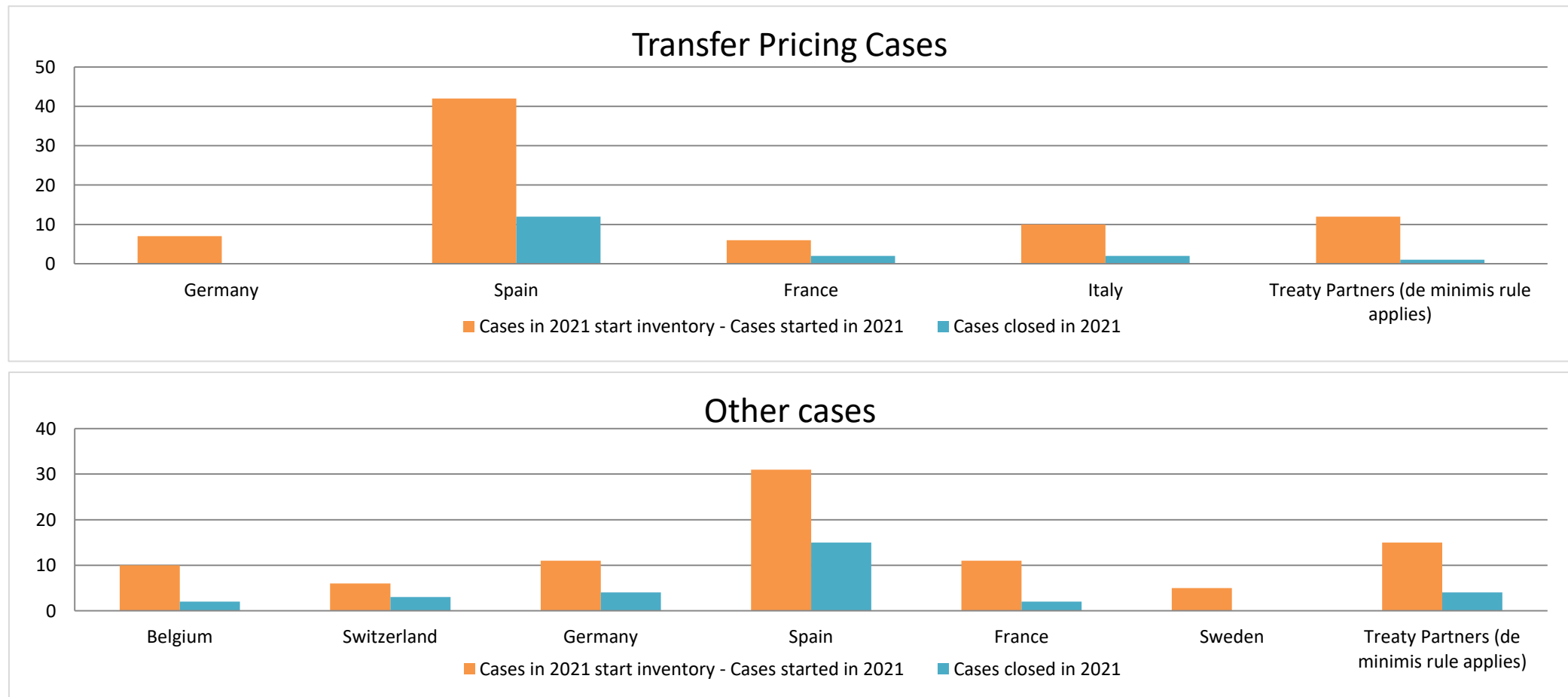
Note: the average time taken to close MAP cases that started before 1 January 2016 was computed by applying the following rules:
 (i) start date: the date when the MAP request was received; and
 (ii) end date: either the date of the closing letter sent to the taxpayer or the date of final closure of 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	26.80	0.97	9.30	22.07
Other cases	9.73	1.14	8.88	17.25

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)

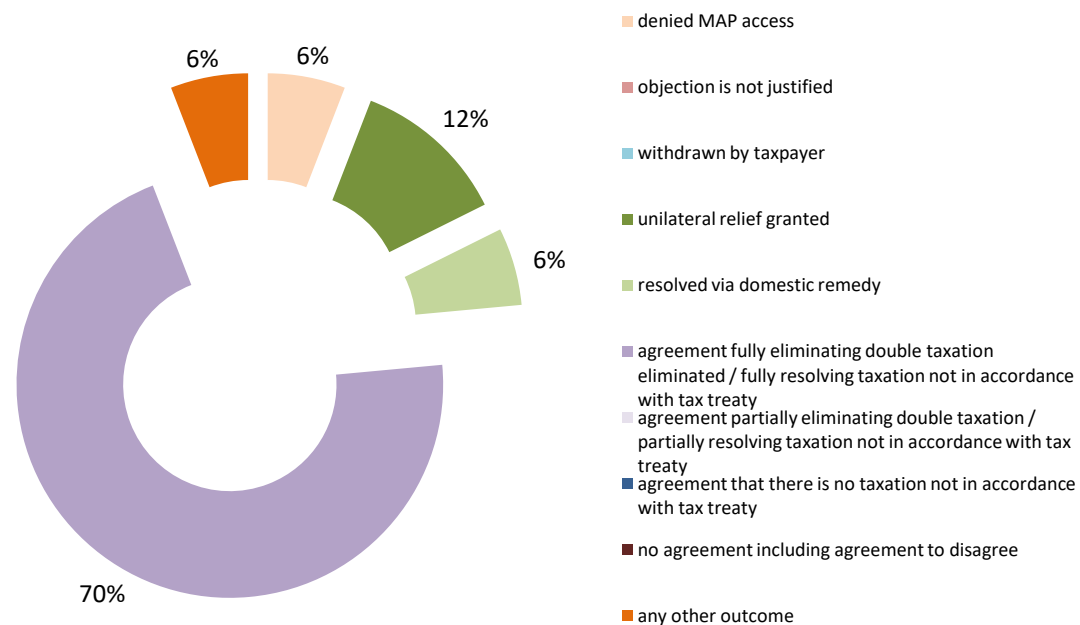
Note: the MAP cases started before 1 January 2016 and closed in 2021 are not shown in these graphs



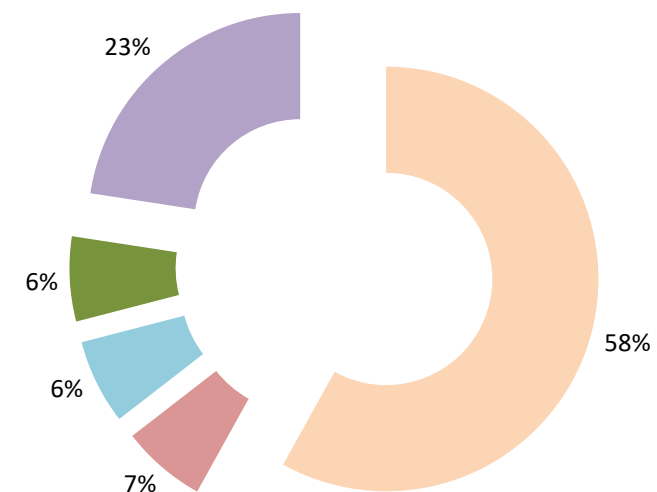
The label "Treaty Partners (de minimis rule applies)" applies to treaty partners with which the number of cases in start inventory plus the number of cases started is less than 5. The relevant MAP statistics are aggregated under this category.

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 - 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)	1	0	0	2	1	12	0	0	0	1	17
Cases started before 1 January 2016	0	0	0	0	0	0	0	0	0	0	0
Cases started as from 1 January 2016	1	0	0	2	1	12	0	0	0	1	17
Other cases (all)	18	2	2	2	0	7	0	0	0	0	31
Cases started before 1 January 2016	0	0	0	0	0	1	0	0	0	0	1
Cases started as from 1 January 2016	18	2	2	2	0	6	0	0	0	0	30
All cases	19	2	2	4	1	19	0	0	0	1	48

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	5	0	0	0	0	0	0	0	0	0	0	5	n.a.
Row 2	Others	4	0	0	0	0	0	1	0	0	0	0	3	87.95
Row 3	Total	9	0	0	0	0	0	1	0	0	0	0	8	87.95
	Notes:													
	Potential mismatches between 2021 start inventory and 2020 end inventory	During the matching process regarding the MAP statistics reporting for 2021 period, we were informed of the existence of another "others cases". Therefore, the correct number of Pre-2016 cases in MAP inventory on 1 January 2021 is 4 and not 3.												
	Notes on the computation of average time	(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.												

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	Germany	4	3	0	0	0	0	0	0	0	0	0	7
	Spain	18	24	0	0	0	0	12	0	0	0	0	30
	France	6	0	1	0	0	0	1	0	0	0	0	4
	Italy	5	5	0	0	0	2	0	0	0	0	0	8
Row 2	Treaty Partners (de minimis rule applies)	9	3	0	0	0	0	0	0	0	0	1	11
	Total	42	35	1	0	0	2	1	12	0	0	1	60
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	Belgium	6	4	1	1	0	0	0	0	0	0	0	8
	Switzerland	1	5	2	0	0	0	1	0	0	0	0	3
	Germany	11	0	0	0	2	1	0	1	0	0	0	7
	Spain	6	25	13	1	0	1	0	0	0	0	0	16
	France	7	4	2	0	0	0	0	0	0	0	0	9
	Sweden	2	3	0	0	0	0	0	0	0	0	0	5
Row 2	Treaty Partners (de minimis rule applies)	11	4	0	0	0	0	4	0	0	0	0	11
	Total	44	45	18	2	2	2	6	0	0	0	0	59
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	Spain	29.51	0.88	9.59	19.92
	France	22.08	1.15	n.a.	n.a.
	Italy	1.81	1.15	n.a.	n.a.
Row 2	Treaty Partners (de minimis rule applies)	53.65	1.35	5.79	47.87
	Total	26.80	0.97	9.30	22.07
Notes:					

Annex B
MAP Statistics Reporting for the 2021 Reporting Period (1 January 2021 to 31 December 2021) for other 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	3.30	1.15	n.a.	n.a.
	Switzerland	12.79	1.10	9.14	21.86
	Germany	20.39	0.98	19.69	19.23
	Spain	4.93	1.24	9.21	19.17
	France	3.55	1.15	n.a.	n.a.
Row 2	Treaty Partners (de minimis rule applies)	21.11	0.94	6.03	15.13
	Total	9.73	1.14	8.88	17.25
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	15.91	1.08	9.15	20.38
	Notes:				