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## **EU Joint Transfer Pricing Forum**

# 2011 Statistics on the number of MAP pending cases under the AC

**Meeting of 7 June 2012** 

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	Requests													
	received	· ·							Requests		•	•		Total
	prior to	received in	pending											
	2001	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	cases
2011	0	0	0-1	1	1-2	2-3	8-11	13-15	22-25	32-36	72-74	70-76	128-148	355-385
2010	0	0	1	1	1-2	2-4	13-18	14-17	30-39	40-49	82-97	79-93		258-330
2009	0-1	0-0	1-2	1-1	1-2	4-4	16-19	22-27	40-51	46-55	86-108			217-270
2008	1-4	1-3	1-3	2	2-4	4-8	21-32	36-43	54-60	54-62				174-221
2007	2	1-5	1-5	4-6	3-8	6-11	29-42	45-66	55-81					146-226
2006	2-5	3-6	0-4	4-9	10-16	8-20	39-55	46-69						112-184
2005	16-24	1-13	5-10	10-18	12-23	12-25	42-68							98-181
2004	24	8	12	24	23	16								107

													MS (	Counte	erpart													
Global	BE	BG	CZ	DK			EE	EL	ES	FR	IT	CY	LV	LT	LU	HU	MT	NL	AT	PL	PT	RO	SI	SK	FI	SE	UK	Total
BE				2	8				1	10	1							2									ļ	24
BG			_										_														ļ	0
CZ					4					1																1		6
DK	2				7				3									2	1						3		3	
DE	8		3	7		2			10		18		_			5		13	12	6	1			1	4	5	20	4
IE 			_		2				2	8																	1	13
EE			_																									0
EL			-	2	40					2	_		-						1		_							2
ES	1	_	_	3				-	22	23			-					2	1		4					_	3	
FR	14	_	1					2	_		23		-			1		2	2					1		5	23	4
IT CY	2		1		18			1	4	24			_		1	1		5	2	1	1		1	1	1	. 3	7	
CY LV													_															0
LV LT	-		-				-		-				_				-						-					0
LU	1				1						1																	3
HU					4						1																	5
MT	-				4																							0
NL				2	13				2	2	5					1			1		1					4		32
AT				1	12				1		1							1							1			20
PL	1			2	6					3	1															1		14
PT				1	1				4		1															_		15
RO																												0
SL																												0
SK					1						1																	2
FI				3	4						1								1							7		16
SE			1	4	5					3	3							3		1					7		1	28
UK				3	19	1			3	27	7							1								2		63
Total	29	0	6	31	168	13	0	3	53	169	68	0	0	0	1	7	0	31	20	13	16	1	1	2	16	33	59	

This table shows the total number of pending cases under the AC at the end of 2011: it aggregates the figures from the yearly tables.

The existence of discrepancies in the number of cases reported by the initiating CA and the counterpart CA can be explained by several factors, such as a disagreement between Competent Authorities on the opening or the closing dates of the case or a disagreement between CAs on whether a case is admissible under the Arbitration Convention.

Due to the existence of these discrepancies, the total number of pending reported cases ranges between 355 and 385.

#### **MS Counterpart** 2011 BE BG CZ DK DE IE EE EL ES FR IT CY LV LT LU HU MT NL AT PL PT RO SI SK FI SE UK Total BE BG CZ DK DE ΙE EE EL ES FR ΙT CY LV LT LU HU MT NL ΑT PL PT RO SL SK FI SE UK 0 1 13 51 22 0 0 0 Total

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Due to the existence of these discrepancies, the total number of pending reported cases ranges between 128 and 148.

#### **MS Counterpart** 2010 BE BG CZ DK DE IE EE EL ES FR IT CY LV LT LU HU MT NL AT PL PT RO SI SK FI SE UK Total BE BG 0 CZ 3 DK 0 12 DE 3 4 38 5 ΙE EE 0 EL 1 1 ES 11 FR 12 5 36 IT 1 12 0 CY LV 0 LT 0 LU 0 ΗU 1 MT NL 5 1 7 ΑT PL 2 PT 2 RO SL SK 1 5 FI 1 1 SE UK 11 1 37 5 0 1 11 35 12 0 0 0 0 0 8 3 2 0 Total 1 1

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Due to the existence of these discrepancies, the total number of pending reported cases ranges between 70 and 76

#### **MS Counterpart** 2009 BE BG CZ DK DE IE EE EL ES FR IT CY LV LT LU HU MT NL AT PL PT RO SI SK FI SE UK Total BE BG CZ DK DE ΙE EE EL ES FR IT CY LV LT LU ΗU MT NL ΑT PL PT RO SL SK FΙ SE UK Total

This table shows the total number of pending cases under the AC at the end of 2011: it aggregates the figures from the yearly tables.

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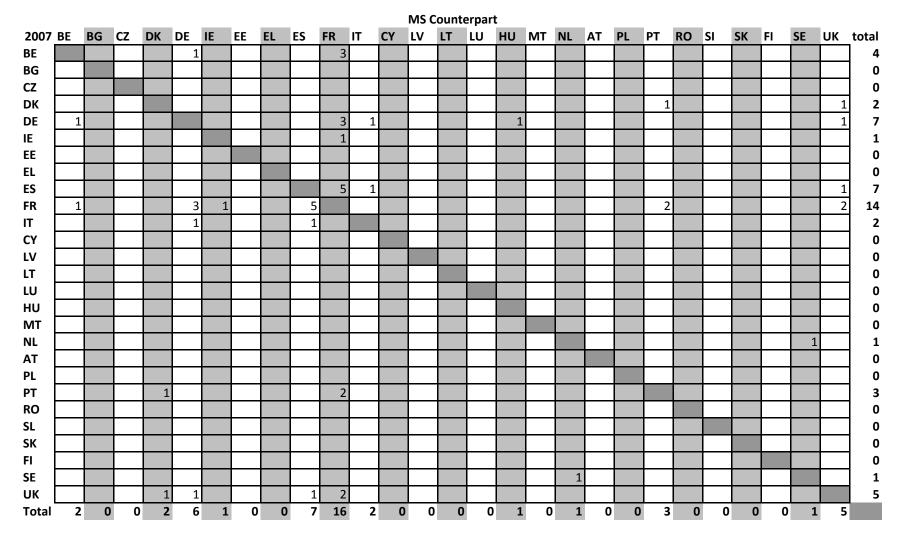
Due to the existence of these discrepancies, the total number of pending reported cases ranges between 72 and 74

### **MS Counterpart** 2008 BE BG CZ DK DE IE EE EL ES FR IT CY LV LT LU HU MT NL AT PL PT RO SI SK FI SE UK total BE 1 0 BG CZ DK 0 DE 1 19 ΙE 0 EE 0 EL ES 7 6 4 19 FR ΙT 6 CY LV LT LU ΗU MT NLΑT PL PT RO SL SK FI SE UK 19 0 0 7 18 6 0 0 0 0 0 Total 0 0

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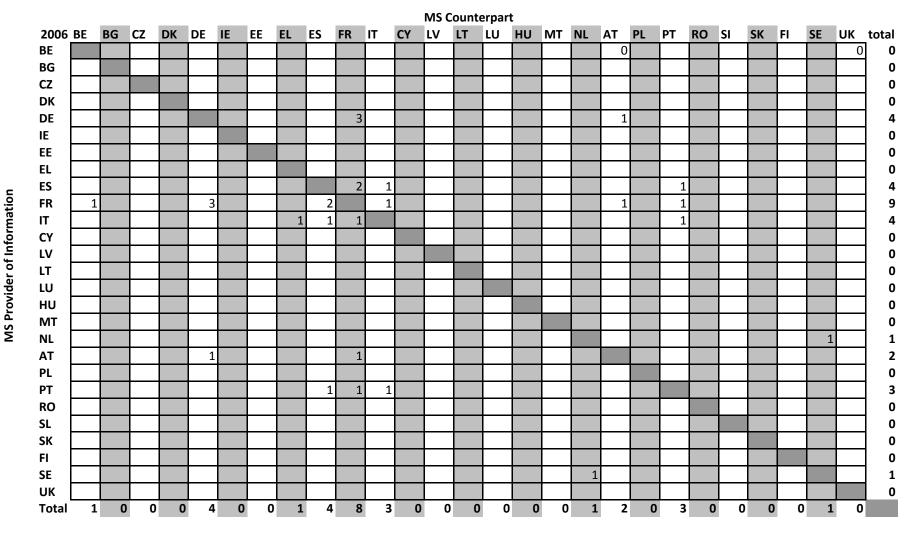
Due to the existence of these discrepancies, the total number of pending reported cases ranges between 32 and 36



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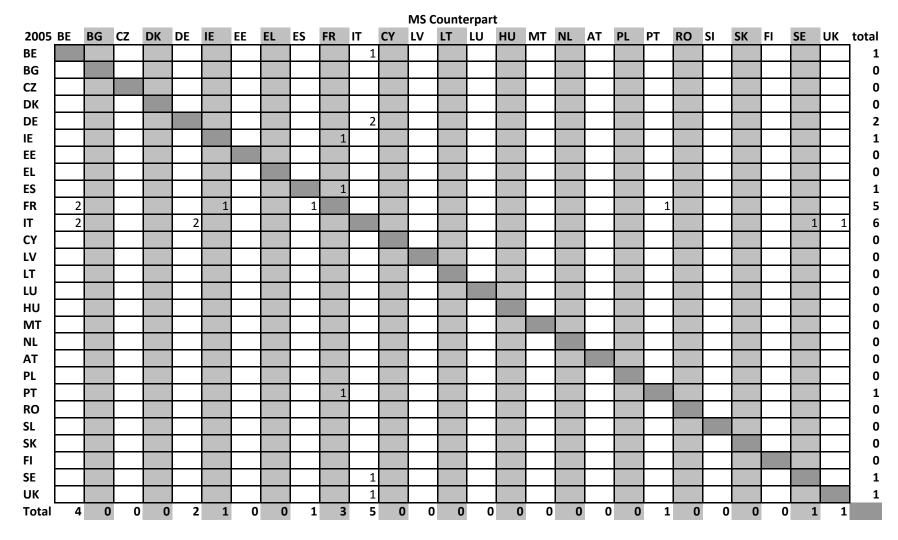
Due to the existence of these discrepancies, the total number of pending reported cases ranges between 22 and 25



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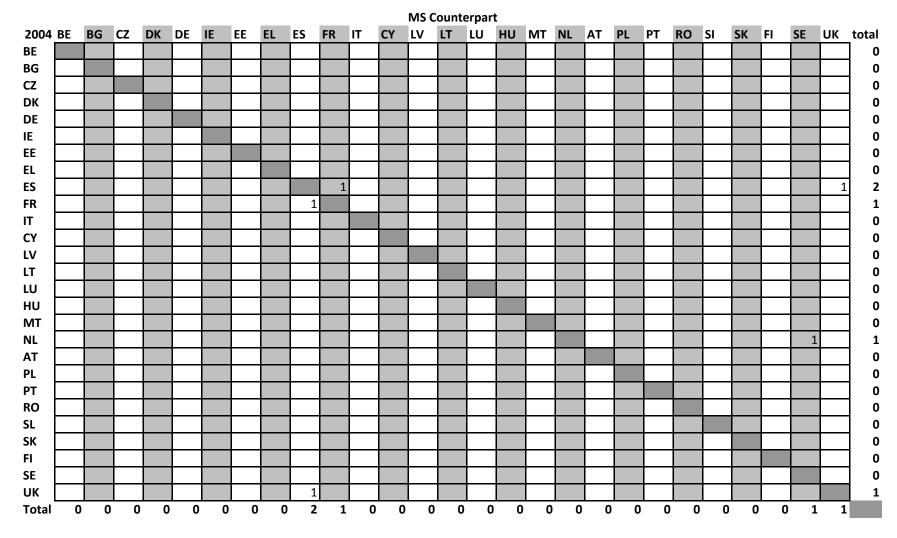
Due to the existence of these discrepancies, the total number of pending reported cases ranges between 13 and 15



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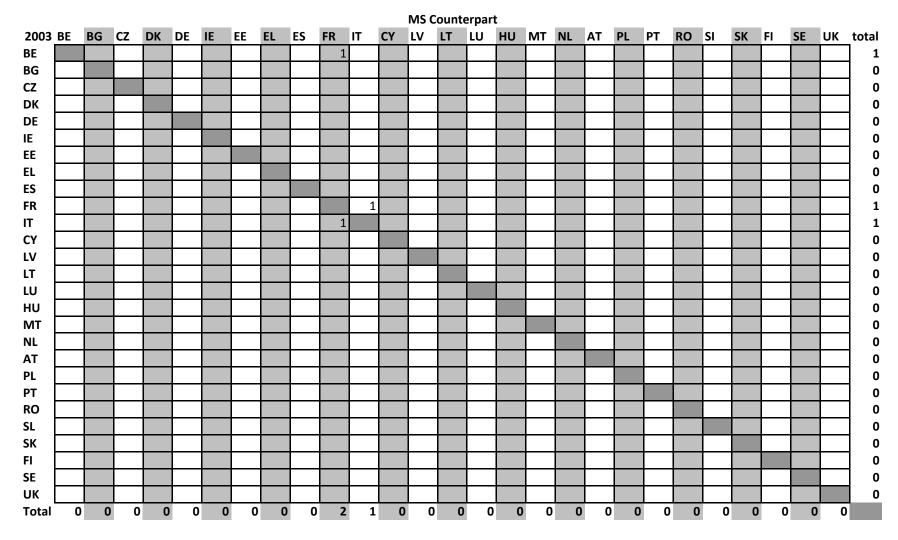
Due to the existence of these discrepancies, the total number of pending reported cases ranges between 8 and 11



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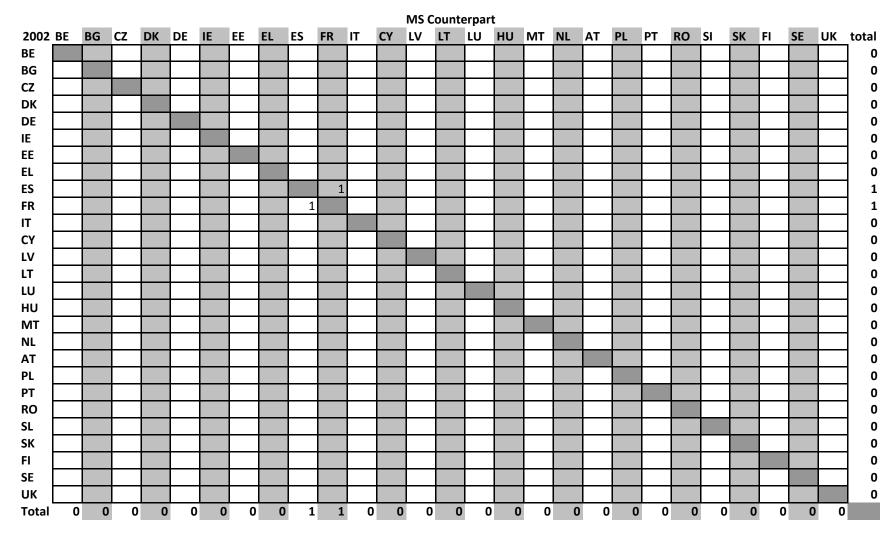
Due to the existence of these discrepancies, the total number of pending reported cases ranges between 2 and 3.



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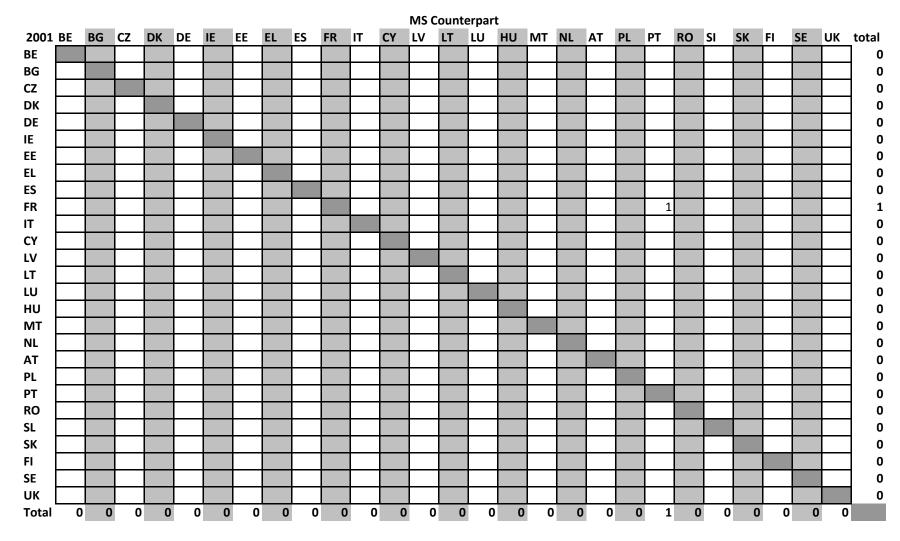
Due to the existence of these discrepancies, the total number of pending reported cases ranges between 1 and 2



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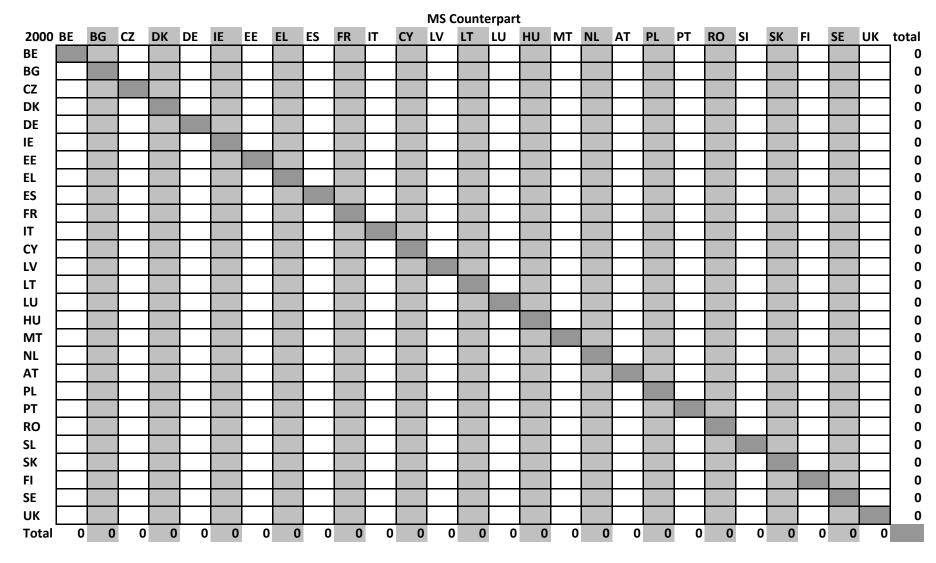
The total number of pending reported cases is 1.



This table shows the total number of pending cases under the AC at the end of 2011: it aggregates the figures from the yearly tables.

The existence of discrepancies in the number of cases reported by the initiating CA and the counterpart CA can be explained by several factors, such as a disagreement between Competent Authorities on the opening or the closing dates of the case or a disagreement between CAs on whether a case is admissible under the Arbitration Convention.

Due to the existence of these discrepancies, the total number of pending reported cases ranges between 0 and 1.



This table shows the total number of pending cases under the AC at the end of 2011: it aggregates the figures from the yearly tables.

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