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TEMPLATE: FINAL REPORT BY THE EXPERT

Advice case title: Deducibility of private pension contributions in Denmark

Full official name of the advised entity: Region Sønderjylland-Schleswig,
Regionskontor & Infocenter

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Table of contents:

Table of contents:	2
1 Executive summary	2
2 Description of the obstacle with indication of the legal/administrative provisions causing the obstacle	3
2.1 Demographics in the Region Sønderjylland-Schleswig	3
2.2 Description of the obstacle with indication of the legal/administrative provisions causing the obstacle	3
2.3 Analysis of the obstacle with indication of the legal/administrative provisions causing the obstacle:	4
A. Limited Tax Liability and Pension Scheme Contributions.	5
A.1 Danish Tax System Overview	5
A.2 Barrier with limited tax liability for cross-border workers:	6
A.2.1. Pension taxation on pension schemes set up by EU/EEA life insurers, pension funds, or credit institutions:	6
B. Foreign pension institutions must apply to the Danish tax authorities for recognition of their products.	7
3. Description of possible solution(s).....	9
3.1 Legislative change could remove barriers.	9
3.2 Re-taxation agreement	9
3.3. pan-European pension products in Denmark.....	10
3.4 Summary	10
4. A full list of all legal provisions relevant to the case with the correct citation both in the original language and in English	10
5. Other relevant aspects to this case if relevant	11
6. References	12

1 Executive summary

This report examines the deductibility of private pension contributions in Denmark. The report examines whether there are barriers for cross-border commuters in the region between Denmark and Germany - Region Sønderjylland-Schleswig. The report finds that there are two criteria in the Danish legislation that constitute barriers to free movement. The first barrier is that cross-border workers need to earn 75% of their income to be eligible for pension deductions. If they don't meet this requirement, they face limited tax liability and can't deduct private pensions. If they relocate to Denmark, they must not have had limited tax liability for three years prior to be eligible for pension deductions. Second, it is a barrier that foreign pension institutions must apply to the Danish tax authorities for recognition of their products. The solution could be found in either an amendment of the Danish legislation, the suggested agreement in the report, or an introduction of PEPP-products on the Danish pension market.

2 Description of the obstacle with indication of the legal/administrative provisions causing the obstacle

The current border obstacle has been reported by Region Sønderjylland-Schleswig, Regionskontor & Infocenter which is an office of the Region Sønderjylland-Schleswig.

The main tasks of the Regionskontor & Infocenter are to provide guidance and consulting to cross-border commuters, businesses in the provision of services, and all people who make use of their right to free mobility.

2.1 Demographics in the Region Sønderjylland-Schleswig

Region Sønderjylland-Schleswig is located in the northernmost part of Germany and the southernmost part of Jutland (Denmark), with a total area of 7.748,91 km² and a population of about 681.325 (Juni 2018), of which 453,987 live in Germany and about 227.383,000 in Denmark.¹

The region consists of 7 municipalities: Tønder, Aabenraa, Sønderborg, and Haderslev on the Danish side of the border and Kreis Schleswig-Flensburg, Kreis Nordfriesland and Stadt Flensburg on the German side of the border.

In 2022, there were a total of 13,273 cross-border commuters. Of these, 12,727 commuted from Germany to Denmark and 546 from Denmark to Germany.²

2.2 Description of the obstacle with indication of the legal/administrative provisions causing the obstacle

The obstacles reported concern cross-border workers commuting from Germany to Denmark.

Both Germany and Denmark have well-established pension systems. This report focuses on private pensions and the possibility of deductibility of private pension contributions in Denmark.

The obstacle involves individuals commuting to work in Denmark and receiving a pension from a scheme administered by a foreign pension institution, specifically in Germany.

In Germany, contributions can be deducted. The pension is taxed as income when it is paid out.

In Denmark, contributions can also be deducted, but under certain conditions. These conditions have been adjusted after case C-150/04 Commission of the European Communities v Kingdom of Denmark. The dispute in the case centered on Danish tax legislation which limited the deductibility or exemption from taxable income of contributions paid to a pension scheme if the pension institution was not established in Denmark.

¹ https://www.region.dk/region/dk/ueber_uns/region/DatenundFaktenRegionSjSl_dk.php cf. Statistisches Landesamt og Danmarks Statistik 6-2018, <https://graenseforeningen.dk/om-graenselandet/leksikon/region-soenderjylland-schleswig>

² Regionskontor & Infocenter, Region Sønderjylland-Schleswig

The European Court of Justice (ECJ) examined whether the Danish tax system maintained symmetry between tax deductions for contributions to domestic pension schemes and those to pension schemes in other Member States. The case also raised issues relating to double taxation conventions and their role in the context of cross-border pension schemes. The ECJ judgment addressed these issues and provided clarity on the application of EU law to national tax systems, particularly in the context of pensions and cross-border taxation.

To comply with the ECJ opinion in the case, Denmark has adjusted their criteria in The Danish Pension Tax Act. (*Bekendtgørelse af lov om beskatningen af pensionsordninger m.v.*³)

Firstly, a deduction criterion has been introduced, according to which the pension insurance must be essentially equivalent to the national pension insurance. This criterion must be considered to comply with EU law, which is also stated by the Advised Entity.

Secondly, reduction requires that the person concerned is either fully liable to tax in Denmark due to residency or fully liable to tax on application. This criterion must also be considered to comply with EU law, which is also stated by the Advised Entity.

Thirdly, the person concerned must not have been limited tax liability before full tax liability (the Advised Entity calls it 'unlimited tax liability'). Tax deductibility in Denmark requires full tax liability, either by staying in Denmark for six months consecutively or being resident in Denmark.

Full tax liability, or taxation according to the cross-border rule, applies if 75% of global income is taxed in Denmark. While some cross-border workers meet this condition, most do not. Early acquisition of cross-border worker status within the calendar year is necessary to meet this rule, hence many cross-border commuters hesitate to fulfill this condition in their first commuting year. Thus, this criterion raises legal concerns.

A further criterion is, that foreign pension institutions must apply to the Danish tax authorities for recognition of their products. This criterion also raises legal concerns and will be analyzed in the following section.

Despite Denmark's adjustment to the Danish Tax Act, it is still difficult for cross-border workers to fulfill the conditions to deduct pension contributions in Denmark.

2.3 Analysis of the obstacle with indication of the legal/administrative provisions causing the obstacle:

The description above identifies two barriers:

- A) Limited tax liability affecting pension scheme contribution deductions.
- B) The requirement for foreign pension institutions to seek approval for their products from Danish tax authorities.

These barriers will be examined in detail below.

³ LBK nr 1327 af 10/09/2020

A. Limited Tax Liability and Pension Scheme Contributions.

A.1 Danish Tax System Overview

The Danish tax system is based on a 'global income principle' (State Tax Act §§4-6), taxing individuals on all income earned worldwide. However, it differentiates between full and limited tax liability:

Full tax liability: Individuals are taxed on all income, including income earned outside Denmark. This applies to those residing in Denmark or those staying in the country for six consecutive months cf. Withholding Tax Act § 1. Several deductions are applicable, which can lower the effective tax rate.

Limited tax liability: Individuals earning income from Denmark but not residing in the country are taxed only on their Danish income. This could include salaries, fees for work performed in Denmark, fringe benefits, or pensions cf. Withholding Tax Act § 2. Only expenses directly related to the taxable income in Denmark are deductible.

Special Rules for Cross-Border Workers: For cross-border workers, a 'lex specialis' has been introduced to provide a set of rules that apply specifically to their situation. These rules serve to address the unique circumstances of cross-border workers, ensuring that tax laws are applied in a way that is fair and recognizes the particularities of working in one country while possibly residing in another. The cross-border rules allow for the deduction of various personal and family expenses. Additionally, certain expenses related to income earned in Denmark can also be deducted. Limited taxpayers not governed by cross-border commuter rules can only deduct expenses associated with earning Danish income, excluding private interest expenses, pension contributions, alimony, and so on.⁴

The 'lex specialis' rules for cross-border workers are called *General Rules for cross-border workers* (grænsegængerreglerne) and are regulated in the Withholding Tax Act § 5 a.

Cross-border workers can choose to be taxed according to the cross-border rules if they fulfill one of the following conditions:

- They are subject to limited tax liability in Denmark and have at least 75% of their entire income subject to taxation in Denmark.
- They are fully taxable (dual-domiciled) and are considered tax residents in their home country and earn at least 75 % of their total income in Denmark.

This report will only focus on the first bullet, not addressing bullet two on dual residency.

⁴ Lov nr. 1339 19/12/2008 om ændring af pensionsafkastbeskatningsloven og pensionsbeskatningsloven, Karnov note 25. / Act no. 1339 19/12/2008 amending the Pension Returns Taxation Act and the Pension Taxation Act, Karnov note 25. (The Danish Karnov, also known as Karnovs Lovsamling, is a comprehensive compilation that contains all significant laws of Denmark. The laws in the collection are annotated with interpretations, rulings, administrative decisions, and references to literature).

A.2 Barrier with limited tax liability for cross-border workers:

In the specific context of Germany and Denmark, the key aspect of the first bullet point is this: Germans who commute to work in Denmark have a limited tax liability. To ensure fairness, individuals can opt for special cross-border rules that allow certain deductions. However, in order to qualify for these rules, 75% of their income must come from their work in Denmark. The start date of employment in Denmark is crucial, as it affects the ability to meet the 75% condition. The later in the year a person starts work, the harder it is to meet this requirement. As a result, those who start later may not qualify for the special cross-border rules and related deductions.

Example 1: If a person residing in Germany begins employment with a Danish company in February, they will be taxed on their income from February to December. Assuming they didn't earn significantly more in January, this income will likely constitute at least 75% of their total annual income. As a result, they *will* be eligible to choose the special cross-border rules.

Example 2: If the same person starts a job in August, less than 75% of their total annual income will likely be subject to Danish tax, assuming the new job does not come with a significantly higher salary. As a result, the person *will not* be eligible to choose the special cross-border rules.

This barrier is linked to the next step: the Danish legislation on pension taxation.

A.2.1. Pension taxation on pension schemes set up by EU/EEA life insurers, pension funds, or credit institutions:

Individuals moving to Denmark and participating in pension schemes established by life insurance companies, pension funds, or credit institutions in another EU/EEA country may become fully taxable under certain conditions.

Pension schemes in another EU/EEA country can be approved in accordance with section 15 D(1) of the Pension Taxation Act if certain conditions are met.

The subsequent conditions need to be fulfilled:

- 1) The pension scheme must have qualified for a reduction in the person's taxable income at the time of establishment.
- 2) The person must have participated in and contributed to the pension scheme for at least one year before moving to Denmark.
- 3) The person must not have been liable to pay tax under section 1, section 2(1), no. 1-4, 7, or 9-29 of the Withholding Tax Act within the last three years before moving to Denmark.
- 4) The pension scheme must essentially correspond to a scheme that fulfills the conditions in Chapter 1.

However, one of these conditions poses a particular obstacle: Number 3, which involves that a person must not have been fully liable to pay tax in Denmark or have limited tax liability on salary income or professional income within the last three years

before moving to Denmark. It therefore refers to the Advised Entity's statement that: *A person must not have been subject to limited tax liability prior to 'unlimited tax liability'* in order to receive a tax deduction for their pension contributions.

This criterion is therefore a barrier for cross-border workers because they are more likely to have been limited tax liable and the criterion therefore excludes most EU citizens who have not lived in Denmark before signing a pension contract.

Consequently, § 15 D (3) disrupts the symmetry in tax legislation between taxable income and allowable deductions.

§ 15 D (5) of the Pension Taxation Act also states that § 15 D (1-4) applies to cross-border commuters covered by section I A of the Withholding Tax Act.

If a cross-border worker has not yet met the 75% condition as described in this report section A.1-2, the person is not yet covered by the cross-border rules that grant them deductibility.

Example 1: If a person residing in Germany begins employment with a Danish company in February, they will be taxed on their income from February to December. Assuming they didn't earn significantly more in January, this income will likely constitute at least 75% of their total annual income. As a result, if they choose the special cross-border rules they *will* be eligible for private pension contribution deductions in Denmark.

Example 2: If the same person starts a job in August, less than 75% of their total annual income will likely be subject to Danish tax, assuming the new job does not come with a significantly higher salary. As a result, the person *will not* be eligible for private pension contribution deductions in Denmark.

B. Foreign pension institutions must apply to the Danish tax authorities for recognition of their products.

Generally, pension schemes established in foreign pension institutions located abroad are not covered by the Danish Pension Tax Act Title I. Therefore, contributions to pension schemes in foreign pension schemes cannot, as a general rule, be deducted from the taxable income cf. § 53 A (2) and § 53 B (4).

However, it is possible to have a scheme established with a pension institution in an EU or EEA country approved by the rules in the Danish Pension Tax Act § 15 C and thereby obtain a right to deduct or exempt contributions to the foreign pension scheme from Danish taxable income.

The Danish Pension Tax Act § 15 C states that:

Persons who have established a pension scheme in a life insurance company, a pension fund, or a credit institution domiciled in a country within the EU/EEA other than Denmark, which in its home country is authorized to conduct life insurance business, pension fund business or credit institution business, may request the Customs and Tax Administration to approve the pension scheme as covered by Chapter 1.

Authorization is granted when several conditions are met cf. § 15 C, (litra 1-6).

Consequently, if a pension provider already has a national license to provide services in its home country, it will need a double license to provide its services on the Danish market, as Rønfeldt and Werlauff argue.⁵

This 'double license' requirement implies that it creates an additional administrative layer for foreign pension providers, potentially affecting the ease with which they can offer cross-border services within the EU.

Thus, this limits the possibility of offering services freely in Denmark due to the strict requirements that must be met in order for pension schemes to be approved.

The restrictions imposed by section 15 C can be seen as obstacles to the freedom to provide cross-border pension services within the EU/EEA. This could potentially conflict with the EU principles of free movement of services.

⁵ Thomas Rønfeldt og Erik Werlauff, Dansk pensionsbeskatning i EU-retlig belysning - en retlig vurdering af Danmarks reaktion på dommen over Danmark i sag C-150/04, Kommissionen mod Danmark, SU 2008.1

3. Description of possible solution(s)

Several legal solutions can be identified to break down the barriers posed by the current rules.

3.1 Legislative change could remove barriers.

Obstacle A: Denmark could amend the Pension Taxation Act (§ 15 D, section 1, (3)) to allow all cross-border commuters to qualify for pension contribution deductions, regardless of whether they were previously subject to limited tax liability.

Obstacle B: By making legislative changes, contributions to German pension schemes could be deductible. This would entail a change to § 15 C by amending the rules on authorization of foreign pension institutions when they already have a license to operate as a pension institution in their home country.

Specifically for the Riester pension scheme: To avoid individual assessments of each pension scheme, Denmark could recognize Riester pension schemes as equivalent to Danish pension schemes once they have been evaluated (the first time). This would ensure consistent deductibility, provided all other general conditions are met.

3.2 Re-taxation agreement

Should legislative amendments prove unfeasible, the introduction of a new re-taxation agreement could serve as a potential solution.

The Opinion of the European Court of Justice (ECJ) in Case C-470/04 *N* addresses the issue of taxation in the context of freedom of movement and freedom of establishment within the EU. The ECJ's decision highlighted that Member States are not prevented from taxing notional increases in the value of substantial shareholdings when tax residence is transferred to another Member State. This principle could potentially be applied to pension schemes, suggesting that Member States could agree on a system to tax pension amounts that have previously been deducted or disregarded.

Although the *N* case specifically concerns the taxation of notional increases in value of substantial shareholdings upon transfer of tax residence, the case sets a precedent that could potentially be applied to pension schemes. The principles established in the case concerning the free movement of persons, freedom of establishment, and direct taxation within the EU could influence the development of mutual recognition agreements for pension schemes between Member States.

The opinion suggests that re-taxation agreements for pension schemes could be a viable solution that respects EU law and the rights of individuals moving between Member States.

A re-taxation agreement is more proportionate than a right of deduction that depends on foreign pension institutions applying to the Danish tax authorities for recognition of their products. Such an agreement also recognizes the argument about the coherence of the tax system, thereby restoring symmetry between tax and deductions.

3.3. pan-European pension products in Denmark

Finally, it could be a solution to introduce a pan-European pension product on the Danish pension market. This could ease movement to and from other countries in the EU, as suggested by in European Commission in COM(2017)706 and enforced with Regulation (EU) 2019/1238 of the European Parliament and of the Council of 20 June 2019 on a pan-European Personal Pension Product (PEPP).

This EU initiative on personal pensions has the potential to address and complement the current divergent rules at the EU and national levels. However, this framework does not replace or harmonize existing national personal pension schemes. Rather, it offers individuals a new framework for voluntary saving, while ensuring adequate consumer protection concerning the essential features of the pension product.

At present, Denmark has no provider of PEPP products. One provider is working on creating a platform (pensions.dk). The scheme may be rolled out in 2024-2025.

However, under existing legislation, PEPP products from other Member States will be subject to approval rules as outlined in Section B. As stated the Danish Pension Tax Act stipulates several requirements for pension schemes. PEPP products must meet these requirements to gain authorization in Denmark.⁶Therefore, the evaluation will be specific, varying from one PEPP institution and product to another.

3.4 Summary

The loss of the right to deduct pension contributions may have discouraged commuters from taking up work in Denmark and exercising their right to mobility. All the above-mentioned solutions can contribute to making commuting more attractive.

4. A full list of all legal provisions relevant to the case with the correct citation both in the original language and in English

Published in the official Danish gazette:

LOV nr 149 af 10/04/1922 Lov om Indkomst- og Formueskat til Staten.

Act no 149 of 10/04/1922 State Tax Act

Lovbekendtgørelse nr 1327 af 10/09/2020 Bekendtgørelse af lov om beskatningen af pensionsordninger m.v. (pensionsbeskatningsloven)

Consolidated Act no 1327 of 10/09/2020 The Danish Pension Tax Act

Lovbekendtgørelse nr 460 af 03/05/2024 Bekendtgørelse af kildeskatteloven

Consolidated Act no 460 of 03/05/2024 the Withholding Tax Act

Lov nr. 1339 af 19/12/2008 om ændring af pensionsafkastbeskatningsloven og pensionsbeskatningsloven, Karnov note 25.

Act no. 1339 of 19/12/2008 amending the Pension Returns Taxation Act and the Pension Taxation Act

⁶ Erhvervsministeriet, Grund-og nærhedsnotat til Folketingets Europaudvalg, 30-05-2018

Published on SKAT.dk

Den juridiske vejledning: C.A.10.4.2.4.3. Ordninger omfattet af reglen PBL § 53 B, Juridisk vejledning

The legal guide: C.A.10.4.2.4.3. Schemes covered by the rule PBL § 53 B, Legal guidance.⁷

Den juridiske vejledning: C.A.10.3 Udenlandske pensions-, forsikrings- og opsparingsordninger godkendt af Skattestyrelsen

The legal guide: C.A.10.3 Foreign pension, insurance and savings schemes approved by the Danish Tax Agency

Published in CURIA:

C-150/04 Kommissionen for De Europæiske Fællesskaber mod Kongeriget Danmark

C-150/04 Commission of the European Communities v Kingdom of Denmark

C-470/04 N. mod Inspecteur van de Belastingdienst Oost/kantoor Almelo

C-470/04 N v Inspecteur van de Belastingdienst Oost/kantoor Almelo.

Published in EUR-LEX:

Regulation (EU) 2019/1238 of the European Parliament and of the Council of 20 June 2019 on a pan-European Personal Pension Product (PEPP).

COM(2017) 343 final

5. Other relevant aspects to this case if relevant

The Advised Entity (Region Sønderjylland-Schleswig, Regionskontor & Infocenter) has sent the following question to the Minister of Foreign Affairs:

Question (translated from Danish):

“Denmark rejects tax favors for foreign pension schemes

In the European Court of Justice's ruling of 30 January 2007 - C-150/04, Denmark was ordered to treat contributions to foreign pension schemes in the same way as contributions to Danish supplementary pension schemes.

Denmark has only complied with this judgment to a very limited extent. Since the judgment, these contributions have been tax deductible, but very significant obstacles have been introduced. One of them discriminates against cross-border commuters.

A basic condition for the right to deduct is that the pension scheme largely corresponds to the Danish pension schemes.

One of the conditions for tax deductibility is that you are fully taxable in Denmark or fully taxable upon application. This would be in line with the judgment if the additional condition did not state that you must not have had limited tax liability before you became fully taxable. But this is typical for cross-border workers.

You are fully taxable upon application, i.e. taxable according to the cross-border rule, if you tax 75% of your global income in Denmark.

Some cross-border workers fulfil this condition, but most do not. You must have cross-border worker status very early in the calendar year to fulfil the rule. Thus, a majority

⁷ Status som cirkulære og er tilgængelig på skat.dk. / Status as a circular and is available on skat.dk.

of cross-border commuters did not dare to fulfil this condition in the first commuting year.

Solution: Denmark abolishes this clause in the law and gives all cross-border commuters who are fully taxable upon application a tax deduction for the contributions. Specifically regarding the Riester pension scheme: To save the individual assessment of each pension scheme, Denmark could equate Riester pension schemes with the Danish pension schemes once they have been tested once, and thus always grant deductibility if the general conditions are otherwise met.

I would be happy if you could contribute with a solution.

Kind regards.”

The question is similar to what is enquired about and addressed in this report. The Minister’s response could provide clarity on whether the Danish state believes it has adhered to judgment C-150/04. However, even if the Minister affirms that the Danish state complies with the judgment through existing legislation, this report maintains that obstacles still exist for the deductibility of private pension contributions for cross-border commuters in the Region Sønderjylland-Schleswig, between Denmark and Germany.

As of 1 July 2024, the Minister’s response remains pending.

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