

Multilateral Instrument (MLI) – Hong Kong Publishes English Synthesized Text of Austria-Hong Kong Tax Agreement

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Report from IBFD Tax Treaties Unit

On 2 May 2023, the Inland Revenue Department of Hong Kong published the English synthesized text of the [Austria - Hong Kong Income and Capital Tax Agreement \(2010\)](#), displaying the modifications made to the agreement by the MLI.

The instrument of approval for the MLI was deposited by China (People's Rep.) on behalf of Hong Kong on 25 May 2022. Austria deposited its instrument of ratification for the MLI on 22 September 2017. The MLI therefore entered into force for Hong Kong on 1 September 2022 and for Austria on 1 July 2018.

China (People's Rep.) on behalf of Hong Kong deposited a notification on 21 February 2023 confirming the completion of its internal procedures for the entry into effect of the MLI provisions with respect to 31 of its covered tax agreements identified in the notification, pursuant to article 35(7)(b) of the MLI (see [Multilateral Instrument \(MLI\) – Hong Kong Deposits Notification of Completion of Internal Procedures Under Article 35\(7\)\(b\) with OECD \(22 February 2023\)](#)).

Each of the MLI provisions could take effect on different dates, depending on the types of taxes involved (taxes withheld at source or other taxes levied) and on the choices made by Hong Kong and Austria in their MLI positions (for earlier reporting, see [Multilateral Convention \(MLI\) – Austria Publishes German Synthesized Text of Austria-Hong Kong Tax Agreement \(23 March 2023\)](#)).

For more details, check the English synthesized text on IBFD's Tax Research Platform: [Austria - Hong Kong Income and Capital Tax Agreement \(2010\) \(English MLI synthesized text 2022\)](#).

The purpose of the synthesized text is to facilitate the understanding of the application of the MLI but it is not in itself a source of law.