## Multilateral Instrument (MLI) – Finland Publishes Updated English, Finnish and Swedish Synthesized Texts of Finland-New Zealand Treaty

8 January 2024

Report from IBFD Tax Treaties Unit

The Finnish Ministry of Justice recently published updated versions of the English, Finnish and Swedish synthesized texts of the Finland - New Zealand Income Tax Treaty (1982), as amended by the 1986 protocol, displaying the modifications made to the treaty by the MLI and specifying additional effective dates with New Zealand. These documents were prepared by the competent authority of Finland and represent its understanding of the modifications made to the treaty by the MLI.

The publication of the updated texts follows Finland's deposition of a notification under article 9 of the MLI on 27 June 2023 (for previous reporting, see Multilateral Instrument (MLI) – Finland Deposits Notification Subsequent to Ratification (29 June 2023)).

Finland and New Zealand deposited their instrument of ratification of the MLI on, respectively, 25 February 2019 and 27 June 2018. The MLI therefore entered into force for Finland on 1 June 2019 and for New Zealand on 1 October 2018.

New Zealand deposited a notification subsequent to ratification on 20 June 2023 (see Multilateral Convention (MLI) – New Zealand Deposits Notification Subsequent to Ratification (20 June 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 Finland and New Zealand in their MLI positions (for earlier reporting, see Multilateral Convention (MLI) – Finland Publishes English, Finnish and Swedish Synthesized Texts of Finland-New Zealand Treaty (24 February 2021)).

For more details, check the synthesized text on IBFD's Tax Research Platform: Finland - New Zealand Income Tax Treaty (1982) (English MLI synthesized text 2019).

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.

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