

Multilateral Instrument (MLI) – Romania Publishes Romanian Synthesized Text of Indonesia-Romania Treaty

29 December 2023

Report from IBFD Tax Treaties Unit

The National Agency for Fiscal Administration of Romania recently published the Romanian synthesized text of the [Indonesia - Romania Income Tax Treaty \(1996\)](#), displaying the modifications made to the treaty by the MLI.

Romania and Indonesia deposited their instrument of ratification of the MLI on, respectively, 28 February 2022 and 28 April 2020. The MLI therefore entered into force for Romania on 1 June 2022 and for Indonesia on 1 August 2020.

Romania deposited additional notifications confirming the completion of its internal procedures for the entry into effect of the MLI provisions, pursuant to article 35(7)(b) of the MLI. For more information concerning the Indonesia treaty, see [Multilateral Instrument \(MLI\) – Romania Deposits Notification of Completion of Internal Procedures Under Article 35\(7\)\(b\) with OECD \(8 March 2023\)](#). Additionally, check the [Romania MLI Reservations and Notifications \(2017\)](#) for more updates on the notifications.

Indonesia deposited additional notifications of completion of its internal procedures for the entry into effect of the MLI provisions pursuant to article 35(7)(b) of the MLI. For more information concerning the Romania treaty, see [Multilateral Instrument \(MLI\) – Indonesia Deposits Further Notification of Completion of Internal Procedures Under Article 35\(7\)\(b\) with OECD \(10 November 2022\)](#). Additionally, check the [Indonesia MLI Reservations and Notifications \(2017\)](#) for more updates on the notifications.

Indonesia also expanded the application of the Multilateral BEPS Convention on its existing treaties on 27 November 2023 (see [Multilateral Instrument \(MLI\) – Indonesia Expands Application of MLI on Existing Treaties \(27 November 2023\)](#)).

Unless stated otherwise in the synthesized text, the provisions of the MLI will have effect with respect to the [Indonesia - Romania Income Tax Treaty \(1996\)](#):

In Romania and Indonesia:

- with respect to taxes withheld at source on amounts paid or credited to non-residents, where the event giving rise to such taxes occurs on or after 1 January 2024; and
- with respect to all other taxes levied by each contracting state, for taxes levied with respect to taxable periods beginning on or after 1 January 2024.

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.

Romania; Indonesia - Multilateral Instrument (MLI) – Romania Publishes Romanian Synthesized Text of Indonesia-Romania Treaty (29 Dec. 2023), News IBFD.

Exported / Printed on 9 Mar. 2024 by hkermadi@deloitte.lu.