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

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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 - Israel Income and Capital Tax Treaty (1997), displaying the modifications made to the treaty by the MLI and specifying additional effective dates with Israel. 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 Israel deposited their instrument of ratification of the MLI on, respectively, 25 February 2019 and 13 September 2018. The MLI therefore entered into force for Finland on 1 June 2019 and for Israel on 1 January 2019.

Israel confirmed the entry into force of some of its tax agreements notified pursuant to article 2 of the MLI on 12 November 2023, as communicated by the OECD Depositary on 1 December 2023 (see Multilateral Instrument (MLI) – OECD Publishes Additional Information on Entry Into Force of Tax Agreements Notified Pursuant to Article 2 (4 December 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 Israel in their MLI positions (for earlier reporting, see Multilateral Convention (MLI) – Finland Publishes Finnish and Swedish Synthesized Texts of Finland-Israel Treaty (24 February 2021) and Multilateral Convention (MLI) – Israel Publishes English Synthesized Text of Finland-Israel Treaty (14 October 2020)).

For more details, check the synthesized text on IBFD's Tax Research Platform: Finland - Israel Income and Capital Tax Treaty (1997) (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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