

# Multilateral Convention (MLI) – Finland Publishes English, Finnish and Swedish Synthesized Texts of Finland-Romania Treaty

15 November 2023

Report from IBFD Tax Treaties Unit

On 14 November 2023, the Finnish Ministry of Justice published the English, Finnish and Swedish synthesized texts of the [Finland - Romania Income Tax Treaty \(1998\)](#), displaying the modifications made to the treaty by the MLI. These documents were prepared in consultation with the competent authorities of Romania and represents their shared understanding of the modifications made to the treaty by the MLI.

Finland and Romania deposited their instrument of ratification of the MLI on, respectively, 25 February 2019 and 28 February 2022. The MLI therefore entered into force for Finland on 1 June 2019 and for Romania on 1 June 2022.

Finland deposited a notification subsequent to ratification on 27 June 2023 (see [Multilateral Instrument \(MLI\) – Finland Deposits Notification Subsequent to Ratification \(29 June 2023\)](#)).

Romania deposited additional notifications confirming completion of its internal procedures for the entry into effect of the MLI provisions pursuant to article 35(7)(b) of the MLI on 6 March 2023, 3 July 2023, 6 September 2023 and 10 November 2023 (see [Multilateral Instrument \(MLI\) – Romania Deposits Notification of Completion of Internal Procedures Under Article 35\(7\)\(b\) with OECD \(8 March 2023\)](#), [Multilateral Instrument \(MLI\) – Romania Deposits Further Notification of Completion of Internal Procedures Under Article 35\(7\)\(b\) with OECD \(6 July 2023\)](#), [Multilateral Instrument \(MLI\) – Romania Deposits Further Notification of Completion of Internal Procedures Under Article 35\(7\)\(b\) with OECD \(8 September 2023\)](#) and [Multilateral Instrument \(MLI\) – Romania Deposits Further Notification of Completion of Internal Procedures Under Article 35\(7\)\(b\) with OECD \(10 November 2023\)](#)).

Unless stated otherwise in the synthesized text, the provisions of the MLI will have effect with respect to the [Finland - Romania Income Tax Treaty \(1998\)](#):

In Finland and Romania:

- 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;
- with respect to all other taxes levied, 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.

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