Finland; Canada

Multilateral Instrument (MLI) – Finland Publishes Updated English, Finnish and Swedish Synthesized Texts of Canada-Finland 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 Canada - Finland Income Tax Treaty (2006), displaying the modifications made to the treaty by the MLI and specifying additional effective dates with Canada. 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 Canada deposited their instrument of ratification of the MLI on, respectively, 25 February 2019 and 29 August 2019. The MLI therefore entered into force for Finland on 1 June 2019 and for Canada on 1 December 2019.

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 Canada in their MLI positions (for earlier reporting, *see* Multilateral Convention (MLI) – Finland Publishes English, Finnish and Swedish Synthesized Texts of Canada-Finland Treaty (2 December 2020)).

For more details, check the synthesized text on IBFD's Tax Research Platform: Canada - Finland Income Tax Treaty (2006) (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.