

Multilateral Convention (MLI) – Spain Publishes Spanish Synthesized Text of Mexico-Spain Treaty

13 November 2023

Report from IBFD Tax Treaties Unit

On 10 November 2023, the Spanish Ministry of Finance and Public Administration published the Spanish synthesized text of the [Mexico - Spain Income and Capital Tax Treaty \(1992\)](#), as amended by the 2015 protocol, displaying the modifications made to the treaty by the MLI.

Spain and Mexico deposited their instrument of ratification of the MLI on, respectively, 28 September 2021 and 15 March 2023. The MLI therefore entered into force for Spain on 1 January 2022 and for Mexico on 1 July 2023.

Spain deposited additional notifications of completion of its internal procedures for the entry into effect of the MLI provisions and Part VI (Arbitration) provisions pursuant to articles 35(7)(b) and 36 of the MLI on 1 June 2022, 30 November 2022, 1 June 2023 and 10 November 2023 (see [Multilateral Instrument \(MLI\) – Spain Deposits Notification of Completion of Internal Procedures Under Articles 35\(7\)\(b\) and 36 with OECD \(2 June 2022\)](#), [Multilateral Instrument \(MLI\) – Spain Deposits Further Notification of Completion of Internal Procedures Under Article 35\(7\)\(b\) with OECD \(1 December 2022\)](#), [Multilateral Convention \(MLI\) – Spain Deposits Further Notification of Completion of Internal Procedures Under Article 35\(7\)\(b\) with OECD \(1 June 2023\)](#) and [Multilateral Instrument \(MLI\) – Spain 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 [Mexico - Spain Income and Capital Tax Treaty \(1992\)](#), as amended by the 2015 protocol:

In Spain:

- with respect to taxes withheld at source, from 1 January 2024; and
- with respect to all other taxes, for tax periods beginning on or after 10 June 2024.

In Mexico:

- with respect to taxes withheld at source, from 1 January 2024; and
- with respect to all other taxes, for tax periods beginning on or after 1 January 2025.

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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