

Multilateral Instrument (MLI) – Japan Publishes Update on Finland-Japan Treaty Specifying Effective Dates with Finland

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Report from IBFD Tax Treaties Unit

On 14 July 2023, the Japanese Ministry of Finance published an update on the applicability of the MLI on the [Finland - Japan Income and Capital Tax Treaty \(1972\)](#) and specifying the effective dates with Finland. The release of the update follows Finland's deposition of a notification under article 9 of the MLI on 27 June 2023 (see [Multilateral Instrument \(MLI\) – Finland Deposits Notification Subsequent to Ratification \(29 June 2023\)](#)). Updated synthesized versions of the treaty are expected to be released by Japan in the near future.

Japan and Finland deposited their instrument of ratification of the MLI on, respectively, 26 September 2018 and 25 February 2019. The MLI therefore entered into force for Japan on 1 January 2019 and for Finland on 1 June 2019.

The notification submitted by Finland on 27 June 2023 shall take effect on the [Finland - Japan Income and Capital Tax Treaty \(1972\)](#):

- for reservations and notifications in respect of provisions relating to taxes withheld at source, where the event giving rise to such taxes occurs on or after 1 January 2024; and
- for reservations and notifications in respect of all other provisions, for taxes levied with respect to taxable periods beginning on or after 1 January 2024.

For earlier reporting, see [Multilateral Convention \(MLI\) – English and Japanese synthesized texts of Finland-Japan treaty published by Japan \(23 April 2019\)](#).

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.