Iceland; Czech Republic; G20; OECD

Multilateral Instrument (MLI) – Iceland Publishes English Synthesized Text of Czech Republic-Iceland Treaty

6 July 2023

Report from IBFD Tax Treaties Unit

The government of Iceland recently published the English synthesized text of the Czech Republic - Iceland Income Tax Treaty (2000), displaying the modifications made to the treaty by the MLI.

Iceland and the Czech Republic deposited their instrument of ratification of the MLI on, respectively, 26 September 2019 and 13 May 2020. The MLI therefore entered into force for Iceland on 1 January 2020 and for the Czech Republic on 1 September 2020.

Iceland expanded the application of the Multilateral BEPS Convention on its existing treaties on 14 December 2021 (see Multilateral Instrument (MLI) – Iceland Expands Application of MLI on Existing Treaties (15 December 2021)).

Unless stated otherwise in the synthesized text, the provisions of the MLI will generally have effect with respect to the Czech Republic - Iceland Income Tax Treaty (2000):

In Iceland:

- 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 2021; and
- with respect to all other taxes, for taxes levied with respect to taxable periods beginning on or after 1
 January 2022.

In the Czech Republic:

- 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 2021; and
- with respect to all other taxes, for taxes levied with respect to taxable periods beginning on or after 1
 March 2021.

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.

