

New Zealand; United Kingdom

Memorandum of Arrangement on Implementing MLI Arbitration Process Under Tax Treaty Between New Zealand and United Kingdom Enters Into Force

30 November 2023

Report from IBFD Tax Treaties Unit

On 2 October 2023 and 11 October 2023, the United Kingdom and New Zealand, respectively, signed a [memorandum of arrangement](#) to establish the mode of application of the arbitration process provided for in [Part VI \(Arbitration\)](#) of the [OECD Multilateral Convention \(MLI\) \(2017\)](#), under article 24 of the [New Zealand - United Kingdom Income Tax Treaty \(1983\)](#), as amended by the 2003 and 2007 protocols, as modified by [article 16 \(Mutual Agreement Procedure\)](#) and [paragraph 10 of article 19 \(Mandatory Binding Arbitration\)](#) of the MLI. The memorandum entered into force on, and is effective from, 11 October 2023.

The competent authorities may modify or supplement this memorandum of arrangement by a joint decision in writing.

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