

Multilateral Instrument (MLI) – France Publishes French Synthesized Text of France-Romania Treaty

18 July 2023

Report from IBFD Tax Treaties Unit

On 18 July 2023, the French government published the French synthesized text of the [France - Romania Income and Capital Tax Treaty \(1974\)](#), displaying the modifications made to the treaty by the MLI.

France and Romania deposited their instrument of ratification of the MLI on, respectively, 26 September 2018 and 28 February 2022. The MLI therefore entered into force for France on 1 January 2019 and for Romania on 1 June 2022.

Romania deposited additional notifications confirming completion of its internal procedures for the entry into effect of the MLI provisions pursuant to article 35(7)(b) of the MLI on 3 July 2023 and on 6 March 2023 (see [Multilateral Instrument \(MLI\) – Romania Deposits Further Notification of Completion of Internal Procedures Under Article 35\(7\)\(b\) with OECD \(6 July 2023\)](#) and [Multilateral Instrument \(MLI\) – Romania Deposits Notification of Completion of Internal Procedures Under Article 35\(7\)\(b\) with OECD \(8 March 2023\)](#)).

France expanded the application of the Multilateral BEPS Convention on its existing treaties on 22 September 2020 (see [Multilateral Instrument \(MLI\) – France Expands Application of MLI on Existing Treaties \(23 September 2020\)](#)).

Unless stated otherwise in the synthesized text, the provisions of the MLI will generally have effect with respect to the [France - Romania Income and Capital Tax Treaty \(1974\)](#):

In France:

- 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 2024; and
- with respect to all other taxes levied by a contracting state, for taxes levied with respect to taxable periods beginning on or after 5 October 2023.

In Romania:

- 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 2024; and
- with respect to all other taxes levied by a contracting state, for taxes levied with respect to taxable periods beginning on or after 1 January 2024.

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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