

Multilateral Instrument (MLI) – Bulgaria Publishes Bulgarian Synthesized Text of Bulgaria-Denmark Treaty

6 March 2024

Report from IBFD Tax Treaties Unit

On 5 March 2024, the National Revenue Agency of Bulgaria published the Bulgarian synthesized text of the [Bulgaria - Denmark Income and Capital Tax Treaty \(1988\)](#), displaying the modifications made to the treaty by the MLI. The document was jointly prepared by the competent authorities of Bulgaria and Denmark and represents their shared understanding of the modifications made to the treaty by the MLI.

Bulgaria and Denmark deposited their instrument of ratification of the MLI on, respectively, 16 September 2022 and 20 September 2019. The MLI therefore entered into force for Bulgaria on 1 January 2023 and for Denmark on 1 January 2020.

Denmark withdrew a reservation made under article 28(2)(a) of the MLI on 29 June 2021 (see [Multilateral Instrument \(MLI\) – Denmark Deposits Notification Regarding Arbitration Subsequent to Ratification \(30 June 2021\)](#)).

Unless stated otherwise in the synthesized text, the provisions of the MLI will have effect with respect to the [Bulgaria - Denmark Income and Capital Tax Treaty \(1988\)](#):

In Bulgaria:

- 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 2023; and
- with respect to all other taxes levied by Bulgaria, for taxes levied with respect to taxable periods beginning on or after 1 January 2024.

In Denmark:

- 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 2023; and
- with respect to all other taxes levied by Denmark, for taxes levied with respect to taxable periods beginning on or after 1 July 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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