

Multilateral Convention (MLI) – Japan Publishes English and Japanese Synthesized Texts of Japan-Vietnam Treaty

31 July 2023

Report from IBFD Tax Treaties Unit

The Japanese Ministry of Finance recently published the English and Japanese synthesized texts of the [Japan - Vietnam Income Tax Treaty \(1995\)](#), displaying the modifications made to the treaty by the MLI.

Japan and Vietnam deposited their instrument of ratification of the MLI on, respectively, 26 September 2018 and 23 May 2023. The MLI therefore entered into force for Japan on 1 January 2019 and will enter into force for Vietnam on 1 September 2023.

Japan expanded the application of the MLI on its existing treaties on 14 February 2020, on 22 July 2020, on 21 April 2022 and on 20 June 2023 (see [Multilateral Instrument \(MLI\) – Japan expands application of MLI on existing treaties \(17 February 2020\)](#), [Multilateral Instrument \(MLI\) – Japan Expands Application of MLI on Existing Treaties \(23 July 2020\)](#), [Multilateral Instrument \(MLI\) – Japan Further Expands Application of MLI on Existing Treaties \(22 April 2022\)](#) and [Multilateral Instrument \(MLI\) – Japan Deposits Further Extension for MLI Application on Existing Treaties by Adding Vietnam \(20 June 2023\)](#)).

Unless stated otherwise in the synthesized text, the provisions of the MLI will generally have effect with respect to the [Japan - Vietnam Income Tax Treaty \(1995\)](#):

In Japan:

- with respect to taxes withheld at source on amounts paid or credited to non-residents, when the event giving rise to such taxes occurs on or after 1 January 2024; and
- with respect to all other taxes levied by Japan, for taxes levied with respect to taxable periods beginning on or after 1 March 2024.

In Vietnam:

- with respect to taxes withheld at source on amounts paid or credited to non-residents, when the event giving rise to such taxes occurs on or after 1 January 2024; and
- with respect to all other taxes levied by Vietnam, for taxes levied with respect to taxable periods beginning on or after 1 January 2025.

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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