

Multilateral Instrument (MLI) – Finland Publishes Updated Finnish and Swedish Synthesized Texts of Finland-France Treaty

8 January 2024

Report from IBFD Tax Treaties Unit

The Finnish Ministry of Justice recently published updated versions of the Finnish and Swedish synthesized texts of the [Finland - France Income and Capital Tax Treaty \(1970\)](#), displaying the modifications made to the treaty by the MLI and specifying additional effective dates with France. These documents were prepared by the competent authority of Finland and represent its understanding of the modifications made to the treaty by the MLI.

The publication of the updated texts follows Finland's deposition of a notification under article 9 of the MLI on 27 June 2023 (for previous reporting, see [Multilateral Instrument \(MLI\) – Finland Deposits Notification Subsequent to Ratification \(29 June 2023\)](#)).

Finland and France deposited their instrument of ratification of the MLI on, respectively, 25 February 2019 and 26 September 2018. The MLI therefore entered into force for Finland on 1 June 2019 and for France on 1 January 2019.

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 \(23 September 2020\)](#)). France confirmed the entry into force of a tax agreement notified pursuant to article 2 of the MLI on 16 November 2023, as communicated by the OECD Depository on 1 December 2023 (see [Multilateral Instrument \(MLI\) – OECD Publishes Additional Information on Entry Into Force of Tax Agreements Notified Pursuant to Article 2 \(4 December 2023\)](#)).

Each of the MLI provisions could take effect on different dates, depending on the types of taxes involved (taxes withheld at source or other taxes levied) and on the choices made by Finland and France in their MLI positions (for earlier reporting, see [Multilateral Convention \(MLI\) – Finland Publishes Finnish and Swedish Synthesized Texts of Finland-France Treaty \(4 December 2020\)](#) and [Multilateral Convention \(MLI\) – French synthesized text of Finland-France treaty published by France \(6 January 2020\)](#)).

For more details, check the synthesized text on IBFD's Tax Research Platform: [Finland - France Income and Capital Tax Treaty \(1970\) \(Finnish MLI synthesized text 2019\)](#).

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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