Finland; Ireland

## Multilateral Instrument (MLI) – Finland Publishes Updated English, Finnish and Swedish Synthesized Texts of Finland-Ireland Treaty

5 January 2024

Report from IBFD Tax Treaties Unit

The Finnish Ministry of Justice recently published updated versions of the English, Finnish and Swedish synthesized texts of the Finland - Ireland Income Tax Treaty (1992), displaying the modifications made to the treaty by the MLI and specifying additional effective dates with Ireland. These documents were prepared in consultation with the competent authority of Ireland and represent their shared 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 Ireland deposited their instruments of ratification of the MLI on, respectively, 25 February 2019 and 29 January 2019. The MLI therefore entered into force for Finland on 1 June 2019 and for Ireland on 1 May 2019.

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 Ireland in their MLI positions (for earlier reporting, see Multilateral Convention (MLI) – Finland Publishes Finnish and Swedish Synthesized Texts of Finland-Ireland Treaty (9 December 2020) and Multilateral Convention (MLI) – English synthesized text of Finland-Ireland treaty published by Ireland (28 April 2020)).

For more details, check the synthesized text on IBFD's Tax Research Platform: Finland - Ireland Income Tax Treaty (1992) (English 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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