



MLI-synthesised text of Indonesian tax treaties with 21 countries are now available ^{P1}

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On 12 November 2019, Indonesia ratified the Multilateral Instrument (MLI) through Presidential Regulation No.77 Year 2019. In this ratified document, Indonesia formally adopted 47 tax treaties as Covered Tax Agreements to be modified as per the MLI mechanism. Please refer to [TaxFlash No.01/2020](#) for a discussion on this process.

On 28 April 2020, Indonesia deposited the instrument of ratification for the MLI. Please refer to [TaxFlash No.19/2020](#) for a discussion on this. The MLI entered into force on 1 August 2020.

On 26 November 2020, Indonesia submitted notification to the Organisation for Economic Cooperation and Development (OECD) (as the depository of the MLI) to confirm the completion of internal procedures for the MLI. There were 22 tax treaties listed by Indonesia in the notification document.

On 18 February 2021, the Directorate General of Taxes (DGT) issued 21 Circulars from No.SE-05/PJ/2021 up to SE-25/PJ/2021 to simultaneously announce that the MLI entered into force, entered into effect, and implemented the key changes to the relevant tax treaty articles (except for Sweden). The detailed changes can be seen in the MLI-synthesised text attached to each DGT Circular.

In the DGT Circulars, the MLI provisions dealing with Indonesian tax came into effect on 1 January 2021 for tax withheld at source and on 1 January 2022 for other taxes.

On the other hand, the MLI provisions dealing with the tax for the counterpart jurisdictions also came into effect on 1 January 2021 for tax withheld at source, except for India which came into effect on 1 April 2021. For other taxes, the commencement date varies. Please see the table below for the effective dates for tax withheld at source and other types of taxes for the counterpart jurisdictions.

Country	Tax withheld at source	Other types of taxes
Australia	01 January 2021	26 June 2021
Belgium	01 January 2021	26 June 2021
Canada	01 January 2021	26 June 2021
Denmark	01 January 2021	01 January 2022
Finland	01 January 2021	01 January 2022
France	01 January 2021	26 June 2021
India	01 April 2021	26 June 2021
Japan	01 January 2021	26 June 2021
Luxembourg	01 January 2021	26 June 2021
Netherlands	01 January 2021	26 June 2021
New Zealand	01 January 2021	26 June 2021
Poland	01 January 2021	26 June 2021
Portugal	01 January 2021	26 June 2021
Qatar	01 January 2021	26 June 2021
Russia	01 January 2021	01 January 2022
Serbia	01 January 2021	26 June 2021
Singapore	01 January 2021	26 June 2021
Slovakia	01 January 2021	26 June 2021
South Korea	01 January 2021	26 June 2021
United Arab Emirates	01 January 2021	26 June 2021
United Kingdom	01 January 2021	26 June 2021

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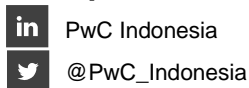
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