

Entry into Force of the US | Luxembourg Double Tax Treaty



On 9 September 2019, the Luxembourg Finance Minister Pierre Gramegna and the United States ("U.S.") Ambassador to Luxembourg exchanged ratification instruments of the Protocol amending the Double Taxation Convention between Luxembourg and the United States, thereby bringing into force the Protocol.

This Protocol, which was agreed in 2009, replaces Article 28 concerning exchange of information with one that follows the OECD Model Tax Convention and the U.S. Model Income Tax Convention.

The new exchange of information article allows the U.S and Luxembourg's respective tax authorities to request information regardless of whether the state from whom the information is requested needs the information for its own tax purposes and that such request cannot be declined solely because the information is held by a bank or other financial institution.

The amended double tax treaty applies to requests for information made on or after the date of entry into force and concerning the tax years beginning on or after 1 January 2009.