

5. Notwithstanding the provisions of paragraph 4, where any greater relief from tax would have been afforded by the provisions of the 1977 Convention, as amended by the 1989 Protocol, any such provision as aforesaid shall continue to have effect:

(a) in Canada

(i) in respect of tax withheld at the source on amounts paid or credited to non-residents, on or before the last day of the calendar year next following that in which the Convention enters into force; and

(ii) in respect of other Canadian tax, for taxation years ending on or before the last day of the calendar year next following that in which the Convention enters into force;

(b) in Italy

in respect of income derived during the taxable periods ending on or before the last day of the calendar year next following that in which the Convention enters into force.

ARTICLE 29

Termination

This Convention shall continue in effect indefinitely but either Contracting State may, on or before June 30 in any calendar year after the expiration of the fifth year from that of its ratification, give to the other Contracting State a notice of termination in writing and through diplomatic channels. In such event, the Convention shall cease to have effect:

(a) in Canada

(i) in respect of tax withheld at the source on amounts paid or credited to non-residents on or after the first day of January in the calendar year following that in which the notice is given; and

(ii) in respect of other Canadian tax for taxation years beginning on or after the first day of January in the calendar year following that in which the notice is given;