

Considering that Article 28 paragraph 6 of the amended Convention provides that any two or more Parties may mutually agree that the amended Convention shall have effect for administrative assistance to earlier taxable periods or charges to tax, I have the honour to propose, on behalf of the Swiss Federal Council, that Switzerland and Canada mutually agree that Article 6 of the amended Convention and the CRS MCAA shall have effect to taxable periods beginning on or after 1 January 2017.

If the above proposal is acceptable to the Government of Canada, I have the honour to suggest that the present letter and Your Excellency's reply reflecting such acceptance should constitute an Agreement between our two Governments in this matter. This Agreement shall enter into force on the later of January 1, 2017 and the date of the notification by which the Government of Canada informs the Swiss Federal Council that the domestic procedures in Canada for its entry into force have been completed. If the entry into force is after January 1, 2017, this Agreement shall be applied provisionally as of January 1, 2017.

Yours/Sincerely,

Ueli Maurer
Federal Councillor