

AGREEMENT BETWEEN THE GOVERNMENT OF CANADA
AND THE GOVERNMENT OF THE REPUBLIC OF VENEZUELA
FOR THE AVOIDANCE OF DOUBLE TAXATION REGARDING
SHIPPING AND AIR TRANSPORT

THE CONTRACTING PARTIES

DESIRING to conclude an agreement for the avoidance of double taxation in respect of the operation of ships and aircraft in international traffic;

HAVING EXAMINED and verified the reciprocity of legal treatment concerning the taxation of such operations;

HAVE AGREED AS FOLLOWS:

ARTICLE I

1. Canada shall exempt Venezuelan enterprises from all taxes on capital relating to, and on income derived from, the operation of ships or aircraft in international traffic.
 2. The Republic of Venezuela shall exempt Canadian enterprises from all taxes on capital relating to, and on income derived from, the operation of ships or aircraft in international traffic.
 3. The exemptions provided in paragraphs 1 and 2 above shall also apply to income derived from, or capital relating to, the participation of Canadian or Venezuelan enterprises in pools, joint businesses or international operating agencies.
 4. In no case shall paragraphs 1, 2 and 3 apply to income not directly derived from or relating to the operation of ships or aircraft in international traffic.
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