

authorities, to defer the tax which would be payable in accordance with paragraph 3. The competent authorities determine in that agreement the terms and conditions of the deferral.”

ARTICLE 6

Paragraph 2 of Article 15 of the Convention shall be deleted and replaced by the following:

“2. Notwithstanding the provisions of paragraph 1, remuneration derived by a resident of a Contracting State in respect of an employment exercised in the other Contracting State shall be taxable only in the first-mentioned State if:

- (a) the recipient is present in the other State for a period or periods not exceeding in the aggregate 183 days in any twelve-month period; and
- (b) the remuneration is paid by, or on behalf of, an employer who is not a resident of the other State; and
- (c) the remuneration is not borne by a permanent establishment or a fixed base which the employer has in the other State.”

ARTICLE 7

There shall be added to Article 21 of the Convention a new paragraph 3, written as follows:

“3. For the purposes of this Article, a trust does not include an arrangement whereby the contributions made to the trust are deductible for the purposes of taxation in a Contracting State.”

ARTICLE 8

Paragraph 1 of Article 28 of the Convention is completed by adding the following:

“... as well as to the Territorial Authority of Saint-Pierre-et-Miquelon.”

ARTICLE 9

1. Paragraph 2 of Article 29 of the Convention shall be deleted and replaced as the following:

“2. An individual who is a resident of a Contracting State and maintains one or several abodes in the territory of the other Contracting State shall not be subject in that other State to an income tax according to an imputed income based on the rental value of that or those abodes.”

2. There shall be added to Article 29 of the Convention a new paragraph 4, written as follows: