7. Contributions in a year in respect of services rendered in that year paid by, or on behalf of, an individual who is a resident of a Contracting State to a pension plan that is recognized for tax purposes in the other Contracting State shall, during a period not exceeding in the aggregate 48 months, be treated in the same way for tax purposes in the first-mentioned State as a contribution paid to a pension plan that is recognized for tax purposes in that first-mentioned State, if

a) such individual was contributing on a regular basis to the pension plan for a period ending immediately before that individual became a resident of the first-mentioned State; and

b) the competent authority of the first-mentioned State agrees that the pension plan generally corresponds to a pension plan recognized for tax purposes by that State.

For the purposes of this paragraph, "pension plan" includes a pension plan created under the social security system in a Contracting State.

ARTICLE 27

Entry into Force

1. The Governments of the Contracting States shall notify each other that the constitutional requirements for the entry into force of this Convention have been complied with.

2. The Convention shall enter into force thirty days after the date of the later of the notifications referred to in paragraph 1 and its provisions shall 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 1 January in the calendar year in which the later of the notifications referred to in paragraph 1 takes place; and

(ii) in respect of other Canadian tax, for taxation years beginning on or after 1 January in the calendar year in which the later of the notifications referred to in paragraph 1 takes place;