

A related issue arises in connection with the privileges and immunities to be accorded to designated entities, their officers and employees where the entity is a private commercial corporation. The Convention provides that Signatories "acting in their capacity as such" shall be exempt from national taxation on income earned from the Organization. The Convention further provides for the conclusion of subsidiary agreements establishing the privileges and immunities of, inter alia, representatives of Signatories exercising their functions. For Canada, this raises the question of the application to a private commercial designated entity, its officers and employees, of the Privileges and Immunities (International Organization) Act. This question has already arisen in the INTELSAT context, but the relevant Protocol between that Organization and Canada has not yet been negotiated and the issue has, as a result, not yet been resolved.