

**EXCHANGE OF NOTES (MAY 15, 1947 AND SEPTEMBER 8, 1947)
BETWEEN CANADA AND FRANCE CONCERNING THE APPLICA-
TION OF THE FRENCH NATIONAL SOLIDARITY TAX TO
CANADIAN NATIONALS AND CORPORATIONS.**

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*The Canadian Embassy in France
to the Ministry of Foreign Affairs of France*

(Translation)

CANADIAN EMBASSY

PARIS, May 15, 1947.

No. 133

In connection with discussions held in recent months between representatives of the Ministries of Foreign Affairs and Finance and officials of the Canadian Embassy with regard to the French Tax on capital and capital gains known as the National Solidarity Tax, the Canadian Embassy has the honour to include two copies of a memorandum summarizing the points upon which the representatives of both governments have reached an agreement with regard to the application of the National Solidarity Tax to Canadian nationals and Canadian companies.

It would be appreciated if the Ministry of Foreign Affairs would kindly communicate the agreement of the French authorities upon the contents of this memorandum.

In the course of the discussions, the Canadian Embassy officials expressed the opinion that, under Articles 2 and 7 of the Convention concerning the rights of nationals and questions of trade and navigation between Canada and France, signed in Ottawa on the twelfth May, 1933, Canadian nationals and companies are entitled to enjoy, for purposes of taxation, the treatment of the most favoured foreign nation. The Canadian Government does not share the interpretation given by the Ministry of Finance in this respect, and a note on the question will soon be sent to the Ministry of Foreign Affairs.