

exchanged shall be treated as secret and shall not be disclosed to any persons other than those concerned with the assessment and collection of the taxes which are the subject of this Agreement. No information shall be exchanged which would disclose any trade secret or trade process.

(2) The Taxation Authorities of the Contracting Governments may consult together as may be necessary for the purpose of carrying out the provisions of this Agreement.

ARTICLE XI

(1) This Agreement shall be ratified and the instruments of ratification shall be exchanged at Pretoria as soon as possible.

(2) This Agreement shall come into force on the date on which the last of all such things shall have been done in the Union and Canada as are necessary to give the Agreement the force of law in the Union and Canada respectively, and shall thereupon have effect—

(a) in the Union, as respects profits derived or deemed to have been derived during the year of assessment ending on the 30th June, 1954, and subsequent years;

(b) in Canada, as respects income taxes, including surtaxes, for the taxation year 1954 and subsequent years.

ARTICLE XII

This Agreement shall be deemed to have superseded the Agreement for the avoidance of double taxation on the income derived from shipping and aircraft entered into on the 26th November 1951,* between the Government of the Union and the Government of Canada and that Agreement shall cease to have effect—

(a) in the Union in respect of income derived from the business of sea or air transport on or after the 1st July, 1953;

(b) in Canada in respect of income derived from the business of sea or air transport after the taxation year 1953.

ARTICLE XIII

(1) This Agreement shall continue in force indefinitely, but either of the Contracting Governments may, on or before the thirtieth day of September in any calendar year after the year 1956, give notice of termination to the other Contracting Government and in such event this Agreement shall cease to be effective—

(a) in the Union, in respect of any year of assessment beginning on the first day of July in the calendar year next following that in which such notice is given;

(b) in Canada, as respects income taxes, including surtaxes, for any taxation year ending in or after the calendar year next following that in which such notice is given.

(2) The termination of this Agreement shall not have the effect of reviving any Agreement or arrangement abrogated by this Agreement.

* Canada Treaty Series 1952, No. 1.