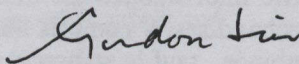


income providing for similar exemptions shall be in force between the two Contracting Parties.

- (6) This Article shall have effect:
- (a) for Hong Kong, for the years of assessment commencing on or after 1 April 1994;
 - (b) for Canada, for the 1994 taxation year and subsequent years.”

If the Government of Canada agrees with the foregoing proposal, I have the honour to propose that the present Note and your Note in reply to that effect shall constitute an Agreement between our two Governments which will enter into force on the date when it has been confirmed in writing by both Governments.

I avail myself of this opportunity to renew to you the assurance of my highest consideration.



Gordon Siu
Secretary for Economic Services