

PROTOCOL
TO THE TAX CONVENTION
BETWEEN THE GOVERNMENT OF CANADA
AND
THE GOVERNMENT OF THE FRENCH REPUBLIC
SIGNED ON MAY 2, 1975 AND AMENDED
BY THE PROTOCOL OF JANUARY 16, 1987

The Government of Canada and the Government of the French Republic, desiring to amend the Convention between Canada and France for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital, signed on May 2, 1975 and amended by the Protocol of January 16, 1987 (hereinafter referred to as «the Convention»), have agreed as follows:

ARTICLE 1

Paragraphs 3 and 4 of Article 2 of the Convention shall be deleted and replaced by the following:

- "3. The existing taxes to which the Convention shall apply are in particular:
 - (a) in the case of Canada, the taxes imposed by the Government of Canada under the *Income Tax Act* (hereinafter referred to as "Canadian tax");
 - (b) in the case of France, the income tax, the corporation tax, the tax on wages and salaries (regulated by the provisions of the Convention applicable, as the case may be, to business profits or to income from independent personal services), the solidarity tax on net wealth, and any withholding tax, prepayment or advance payment with respect to the aforesaid taxes, (hereinafter referred to as "French tax").
4. Notwithstanding the preceding provisions of this Article, the existing taxes to which the Convention shall apply also include, in the case of France, the inheritance tax, but only for the application of Articles 4, 23, 25 and 26.
5. The Convention shall apply also to any identical or substantially similar taxes which are imposed after the date of signature of the Convention in addition to, or in place of, the existing taxes. The competent authorities of the Contracting States shall notify each other of important changes which have been made in their respective taxation laws."