

ARTICLE X

1. Paragraph 1 of Article 24 (Mutual Agreement Procedure) of the Convention shall be amended by deleting the word "two" and replacing it with the word "three".

The amended paragraph shall therefore read as follows:

"Where a person considers that the actions of one or both of the Contracting States result or will result for him in taxation not in accordance with the provisions of this Convention, he may, irrespective of the remedies provided by the domestic law of those States, address to the competent authority of the Contracting State of which he is a resident an application in writing stating the grounds for claiming the revision of such taxation. To be admissible, the said application must be submitted within three years from the first notification of the action which gives rise to taxation not in accordance with the Convention."

2. Paragraph 2 of Article 24 of the Convention shall be amended by adding the following sentence at the end of the paragraph:

"Any agreement reached shall be implemented notwithstanding any time limits in the domestic law of the Contracting States".

The amended paragraph shall therefore read as follows:

"The competent authority referred to in paragraph 1 shall endeavour, if the objection appears to it to be justified and if it is not itself able to arrive at a satisfactory solution, to resolve the case by mutual agreement with the competent authority of the other Contracting State, with a view to the avoidance of taxation which is not in accordance with the Convention. Any agreement reached shall be implemented notwithstanding any time limits in the domestic law of the Contracting States."