

2. This Protocol shall enter into force on the date of the later of the notifications referred to in paragraph 1. The provisions of this Protocol shall have effect for taxable periods beginning on or after 1 January of the calendar year next following the year of the entry into force of this Protocol, and, where there is no taxable period, for all charges to tax arising on or after 1 January of the calendar year next following the year of the entry into force of this Protocol.

IN WITNESS WHEREOF, the undersigned, duly authorized thereto by their respective governments, have signed this Protocol.

DONE in duplicate at Montreal on this 8th day of May 2012, in the English and French languages, each version being equally authentic.

Edward Fast

Etienne Schneider

**FOR THE GOVERNMENT
OF CANADA**

**FOR THE GOVERNMENT
OF THE GRAND DUCHY
OF LUXEMBOURG**