

- of January in the calendar year in which the Convention enters into force;
- (ii) in respect of the corporation tax, for any financial year beginning on or after the first day of January in the calendar year in which the Convention enters into force; and
 - (iii) in respect of the income tax, for any taxation year beginning on or after the first day of January in the calendar year in which the Convention enters into force.

2. The agreement between Canada and France for the avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income signed at Paris on March 16, 1951 is terminated. Its provisions shall cease to have effect from the date on which the corresponding provisions of this Convention take effect in accordance with the provisions of paragraph 1.

ARTICLE XXXI

Termination

This Convention shall continue in effect indefinitely but either Contracting State may, on or before June 30 in any calendar year after the year 1977, give notice of termination to the other Contracting State and, in such event, the Convention shall cease to have effect:

(a) in Canada:

- (i) in respect of tax withheld at the source on amounts paid or credited to non-residents on or after the first day of January in the calendar year next following that in which the notice is given, and
- (ii) in respect of other taxes, in the case of companies, for any financial year beginning on or after the first day of January in the calendar year next following that in which the notice is given, and in other cases, for any taxation year beginning on or after the first day of January in the said year;

(b) in France:

- (i) for the withholding tax and the prepayment (*précompte*) relating to any amounts payable on or after the first day of January in the calendar year next following that in which the notice is given,
- (ii) in respect of the corporation tax, for any financial year beginning on or after the first day of January in the calendar year next following that in which the notice is given, and
- (iii) in respect of the income tax, for any taxation year beginning on or after the first day of January in the calendar year next following that in which the notice is given.