

ARTICLE V

The following new paragraph shall be inserted immediately after paragraph 7 of Article 28 of the Convention:

“8. Notwithstanding any provisions of the respective domestic laws of the Contracting States imposing time limits for applications for relief from tax, an application for relief under the provisions of this Convention shall have effect, and any consequential refunds of tax made, if the application is made to the competent authority concerned within one year of the end of the calendar year in which this Convention enters into force.”

ARTICLE VI

1. Each of the Contracting States shall notify to the other the completion of the procedure required by its law for the bringing into force of this Protocol. This Protocol shall enter into force on the date of the later of these notifications and shall, subject to the provisions of paragraph 2 of this Article, thereupon have effect in accordance with Article 28 of the Convention.

2. The provisions of Article 27A of the Convention (as added by Article IV of the Protocol) shall have effect:

(a) in the United Kingdom, for any year of assessment, financial year or chargeable period beginning on or after 1 April in the calendar year next following that in which the Protocol enters into force;

(b) in Canada:

(i) in respect of tax withheld at the source on amounts paid or credited to non-residents on or after 1 January in the calendar year next following that in which the Protocol enters into force; and

(ii) in respect of other Canadian taxes for any taxation year beginning on or after 1 January in the calendar year next following that in which the Protocol enters into force.

3. This Protocol shall cease to be effective at such a time as the Convention ceases to be effective in accordance with Article 29 of the Convention.