

brought before the Council for Trade in Services, as provided by that paragraph, only with the consent of both Contracting States.

5. Where in accordance with any provision of this Convention income derived by a resident of a Contracting State is exempt from tax in that State, such State may nevertheless, in calculating the amount of tax on other income, take into account the exempted income.

VI. FINAL PROVISIONS

Article 28

Entry into Force

1. Each of the Contracting States shall take all measures necessary to give this Convention the force of law within its jurisdiction and each shall notify the other of the completion of such measures. This Convention shall enter into force on the date on which the later notification is made and shall thereupon have effect:

- (a) in respect of tax withheld at the source on amounts paid or credited to non-residents on or after the first day of the second month following the date on which this Convention enters into force; and
- (b) in respect of other taxes for taxation years or years of income beginning on or after the first day of January in the calendar year in which this Convention enters into force.

2. The provisions of the Agreement between the Government of Canada and the Government of Trinidad and Tobago with respect to taxes on income, for the avoidance of double taxation, the prevention of fiscal evasion, and encouragement of international trade and investment signed at Washington on September 28th, 1966, shall cease to have effect with respect to taxes to which this Convention applies in accordance with the provisions of paragraph 1. Where, however, any greater relief from tax would have been afforded by any provision of that Agreement than is due under this Convention, any such provision as aforesaid shall continue to have effect with respect to taxes referred to in subparagraph (b) of paragraph 1:

- (a) in Canada, for any taxation year;
- (b) in Trinidad and Tobago, for any year of income;

beginning before the entry into force of this Convention.