

2. The provisions of the Protocol shall apply:

(a) in Canada:

- (i) in respect of tax withheld at source, for amounts paid or credited to non-residents on or after the day on which the Protocol enters into force; and
- (ii) in respect of other taxes, for any taxation year beginning on or after the day on which the Protocol enters into force;

(b) in France:

- (i) in respect of the withholding taxes, for any amount paid on or after the day on which the Protocol enters into force;
- (ii) in respect of taxes on income which are not levied by way of withholding tax, to income earned in any calendar year or relating to any accounting period beginning on or after the day on which the Protocol enters into force; and
- (iii) in respect of other taxes, to taxation years with respect to taxable events occurring on or after January 1 following the year in which the Protocol enters into force.

3. Notwithstanding the provisions of paragraph 2:

- (a) the provisions of subparagraph (a) of paragraph 2 of Article 10 of the Convention, as modified by the Protocol, shall apply in respect of Canadian tax withheld at source to amounts paid on or after the day on which the Protocol enters into force, except that the "5 per cent" percentage shall be replaced by:

- (i) "7 per cent" for amounts paid in 1995; and
- (ii) "6 per cent" for amounts paid in 1996;

- (b) the provisions of paragraph 8 of Article 10 of the Convention, as modified by the Protocol, shall apply in respect of other Canadian taxes for taxable periods beginning on or after the day on which the Protocol enters into force, except that the "5 per cent" percentage is replaced by the following percentages for taxable periods beginning on or after that date and ending in the course of the following years:

- (i) 1995: "7 per cent";
- (ii) 1996: "6 per cent".

4. Notwithstanding the provisions of paragraph 2, the provisions of paragraph 9 of Article 29 of the Convention, as modified by the Protocol, shall apply for taxation years not prescribed on the date of entry into force of the Protocol.

5. The provisions of the Convention between Canada and France for the avoidance of double taxation and the prevention of fiscal evasion in relation to succession duties signed at Paris on March 16, 1951, shall cease to have effect with respect to estates of persons deceased on or after the first day of January of the year next following that during which the Protocol enters into force. That Convention shall terminate on the last date on which it has effect in accordance with the provisions of this paragraph.