The provisions of this paragraph shall not impose upon either Contracting State the obligation to carry out administrative measures different from those used in the collection of its own taxes, or which would be contrary to its sovereignty, security, public policy or its essential interests."

Article VI

- 1. This Protocol shall be ratified and the instruments of ratification shall be exchanged as soon as possible.
- 2. The Protocol shall enter into force 60 days after the exchange of the instruments of ratification and its provisions shall 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 that in which the Protocol enters into force, and
 - (b) in respect of other tax, for taxation years beginning on or after the first day of the second month following that in which the Protocol enters into force.

IN WITNESS WHEREOF the undersigned, duly authorized to that effect, have signed this Protocol.

DONE in duplicate at / , this /5 day of fune 1999, in the English, French and German languages, each version being equally authentic.

FOR THE GOVERNMENT

Paul Dubois

OF THE REPUBLIC OF AUSTR

Gregor Woschnagg