

ARTICLE 14

Article 19 of the Convention shall be deleted and replaced by the following:

"Article 19

Government Service

1. Salaries, wages and other similar remuneration, other than a pension, paid by a Contracting State or a province in the case of Canada or a local authority or an instrumentality thereof to an individual who is a national of that State in respect of services rendered to that State, province, authority or agency or instrumentality, shall be taxable only in that State.
2. The provisions of paragraph 1 shall not apply to salaries, wages and other similar remuneration paid in respect of services rendered in connection with a trade or business carried on by a Contracting State, a province in the case of Canada, a local authority, or by one of their agencies or instrumentalities."

ARTICLE 15

Article 22 of the Convention shall be deleted and replaced by the following:

"Article 22

Capital

1. Capital represented by immovable property owned by a resident of a Contracting State and situated in the other Contracting State, may be taxed in that other State.
2. Capital represented by shares or other rights in a company the assets of which consist principally of immovable property situated in a Contracting State and referred to in subparagraph (d) of paragraph 1 of Article 13, may be taxed in that State.
3. Capital represented by movable property forming part of the business property of a permanent establishment which an enterprise of a Contracting state has in the other Contracting State or by movable property pertaining to a fixed base available to a resident of a Contracting State in the other Contracting State for the purpose of performing independent personal services, may be taxed in that other State.
4. Capital represented by shares or other rights (other than shares or other rights referred to in paragraph 2) forming part of a substantial interest in a company which is a resident of a Contracting State may be taxed in that State. A substantial interest is considered to exist when an individual holds, alone or with related persons, directly or indirectly, shares or other rights the total of which gives right to at least 25 per cent of the profits of the company.
5. Capital of an enterprise of a Contracting State represented by ships and aircraft operated by that enterprise in international traffic or by movable property pertaining to their operation, or by containers referred to in paragraph 4 of Article 8, shall be taxable only in that State.