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Swiss Confederation

The Head of the Federal Department FDF
The Head of the Federal Department of Finance FDF

The Honourable William Francis Morneau
Minister of Finance of the Government of Canada
Depaartment of Finance Canada
90 Elgin Street
Ottawa, Ontario K1A 0G5
Canada

Bern, 9 December 2016

Your Excellency,

I have the honour to refer to the Joint Declaration signed on 4 February 2016, declaring the intention of Switzerland and Canada to introduce on a reciprocal basis automatic exchange of financial account information in tax matters based on the OECD Common Reporting Standard and the Commentaries thereon between each other, beginning in the year 2017 (first transmission of data in 2018), as well as to the Convention of 25 January 1988 on Mutual Administrative Assistance in Tax Matters as amended by the Protocol of 27 May 2010 amending the Convention on Mutual Administrative Assistance in Tax Matters (hereafter "amended Convention").

This automatic exchange of information shall be based on Article 6 of the amended Convention and the Multilateral Competent Authority Agreement of 29 October 2014 on Automatic Exchange of Financial Account Information (thereafter "CRS MCAA"). Pursuant to its Article 28 paragraph 6, the amended Convention shall have effect for administrative assistance related to taxable periods beginning on or after 1 January of the year following the one in which the amended Convention entered into force in respect of a Party, or where there is no taxable period, for administrative assistance related to charges to tax arising on or after 1 January of the year following the one in which the amended Convention entered into force in respect of a Party.

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