

private investment capital from abroad. In fact, however, the major capital-exporting countries have greatly reduced their tax claims on income derived from foreign investments, thus *de facto* going a long way toward meeting the wishes of capital-importing countries. Canadian tax legislation is as liberal in this regard as the legislation of any other developed countries.

During the discussion of international tax problems at the twenty-second session of ECOSOC, the Canadian Representative made the following statement: "While believing that the main responsibility for attracting private foreign investment must inevitably rest with the less developed countries themselves, the Canadian Government also recognizes that the more economically advanced countries should facilitate the flow of private capital to these areas. One of the things that the more advanced countries can do is to make sure that their tax structures do not impede investment abroad. This, I believe, is true of our Canadian tax laws relating both to individuals and corporations. Further, we have concluded reciprocal tax conventions with other governments for avoidance of multiple taxation. We believe that a wider application of double taxation agreements between capital-exporting and capital-importing countries would remove some of the existing deterrents to foreign investment. We are willing to conclude agreements of this type with other governments where they can be adapted to meet the particular problems of the countries concerned."

Both ECOSOC and the eleventh session of the General Assembly approved resolutions asking the Secretary-General to continue his studies of the taxation of private investment by capital-exporting and capital-importing countries, and to submit them to ECOSOC for its consideration.

Peaceful Uses of Atomic Energy

Following the resolution unanimously approved by the General Assembly on December 4, 1954, expressing the hope that the International Atomic Energy Agency would be established without delay, a draft statute for the Agency was circulated in August 1955 by the United States on behalf of eight sponsoring governments (Australia, Belgium, Canada, France, Portugal, South Africa, the United Kingdom and the United States). At the tenth session of the General Assembly, on December 3, 1955, a resolution was adopted noting with satisfaction the progress being made and welcoming the "extension of invitations to the Governments of Brazil, Czechoslovakia, India and the U.S.S.R. to participate as governments concerned with the present sponsoring governments" in further negotiations.

The twelve governments concerned held a "Working Level Meeting" in Washington in the spring of 1956 to prepare a draft statute, based on the original draft of August 1955, and taking account of comments on that draft submitted by a number of governments and also of views expressed during the debate at the tenth session of the General Assembly. During these meetings a number of differences of view emerged, but by patient negotiation and a willingness on the part of all to accept reasonable compromises the meetings reached unanimous agreement on the text of a draft to be submitted to a general conference of prospective member states. This draft provided that all states which were members of the United Nations or of any of the Specialized Agencies might join the Agency as initial