

2. It is understood that the standard of “foreseeable relevance” is intended to provide for exchange of information in tax matters to the widest possible extent and, at the same time, to clarify that Contracting States are not at liberty to engage in “fishing expeditions” or to request information that is unlikely to be relevant to the tax affairs of a given taxpayer. While paragraph 1 of this Protocol contains important procedural requirements that are intended to ensure that fishing expeditions do not occur, subparagraphs (a) through (f) of paragraph 1 nevertheless need to be interpreted liberally in order not to frustrate effective exchange of information.

3. It is understood that paragraph 5 of Article 26 of the Convention does not require the Contracting States to exchange information on a spontaneous or automatic basis.

IN WITNESS WHEREOF the undersigned, duly authorised thereto by their respective Governments, have signed this Interpretative Protocol.

DONE in duplicate at Vienna, this 9th day of March 2012, in the English, French and German languages, each version being equally authentic.

John Barrett

Andreas Schieder

FOR CANADA

**FOR THE REPUBLIC
OF AUSTRIA**