

DOMINION OF CANADA

TREATY SERIES, 1929

No. 8

EXCHANGE OF NOTES

(May 2, 1929)

recording an Agreement

BETWEEN

CANADA AND NORWAY

providing for the

RECIPROCAL EXEMPTION FROM INCOME TAX

OF EARNINGS

DERIVED FROM THE OPERATION OF SHIPS



OTTAWA

F. A. ACLAND

PRINTER TO THE KING'S MOST EXCELLENT MAJESTY

1930

32 756 009

b 1628124

DOMINION OF CANADA

TREATY SERIES, 1929

No. 8

EXCHANGE OF NOTES

(May 2, 1929)

recorded in an Agreement

BETWEEN

CANADA AND NORWAY

providing for the

RECIPROCAL EXEMPTION FROM INCOME TAX  
OF EARNINGS  
DERIVED FROM THE OPERATION OF SHIPS



OTTAWA  
F. A. ADAMS  
PRINTED TO THE KING'S MOST EXCELLENT MAJESTY

1929

30 525 004  
F. 1628194

From the Secretary of State for External Affairs of Canada to the Consul-General of Norway for Canada

DEPARTMENT OF EXTERNAL AFFAIRS.

OTTAWA, May 2, 1929.

SIR,—  
It being the desire of our respective Governments to effect an arrangement for reciprocal exemption from Income Tax of income arising within their respective countries from the operation therein of ships owned or controlled by and used in the business of persons or corporations resident in the country of the other, I have the honour to inform you that the Canadian Government agrees to the following undertaking:

1. In respect of the Dominion of Canada the Canadian Government undertakes that in accordance with the provisions of the Income War Tax Act the income from the operation of ships owned or operated by persons or corporations resident in Norway shall not be liable to taxation.

2. In respect of Norway the Norwegian Government undertakes that in accordance with the Norwegian Taxation Acts the income from the operation of ships owned or operated by persons or corporations resident in Canada shall in like manner be exempt from taxation.

3. It is understood that the expression "operation of ships" means the business carried on by an owner of ships and that for the purpose of this definition the expression "owner" includes any charterer.

4. It is agreed that the exemption from income tax on the income derived from the operation of the aforementioned ships shall be deemed to be effective in respect of the income of fiscal periods ending in the year 1929 and each year thereafter until rescinded by either party giving to the other notice one year in advance of the fiscal periods affected, or until otherwise rescinded by the repeal of the income tax laws of either country.

5. It is further agreed that taxes which have been paid by persons or corporations resident in the country of the other and which have been paid more than a year from the date hereof shall not be refunded.

I have the honour to be, etc.,

O. D. SKELTON.

*For the Secretary of State for External Affairs.*

Consul-General of Norway,  
p.t. Ottawa.



*From the Consul-General of Norway for Canada to the Secretary of State for  
External Affairs of Canada*

ROYAL NORWEGIAN CONSULATE GENERAL

p.t. OTTAWA, 2nd May, 1929.

SIR,—

It being the desire of our respective Governments to effect an arrangement for reciprocal exemption from Income Tax of Income arising within their respective countries from the operation therein of ships owned or controlled by and used in the business of persons or corporations resident in the country of the other, I have the honour to inform you that the Government of Norway agrees to the following undertaking:—

1. In respect of Norway the Norwegian Government undertakes that in accordance with the Norwegian Taxation Acts the income from the operation of ships owned or operated by persons or corporations resident in Canada shall not be liable to taxation.

2. In respect of the Dominion of Canada the Canadian Government undertakes that in accordance with the provisions of the Income War Tax Act the income from the operation of ships owned or operated by persons or corporations resident in Norway shall in like manner be exempt from Taxation.

3. It is understood that the expression "operation of ships" means the business carried on by an owner of ships and that for the purpose of this definition the expression "owner" includes any charterer.

4. It is agreed that the exemption from income tax on the income derived from the operation of the aforementioned ships shall be deemed to be effective in respect of the income of fiscal periods ending in the year 1929 and each year thereafter until rescinded by either party giving to the other notice one year in advance of the fiscal periods affected, or until otherwise rescinded by the repeal of the income tax laws of either country.

5. It is further agreed that taxes which have been paid by persons or corporations resident in the country of the other and which have been paid more than a year from the date hereof shall not be refunded.

I have the honour to be, etc.,

LUDWIG AUBERT,

*Consul-General of Norway.*

The Honourable

The Secretary of State for External Affairs,

Ottawa.