

N° 2350.

FRANCE ET NORVÈGE

Echange de notes comportant un accord relatif à l'exonération réciproque de l'impôt sur le revenu en ce qui concerne les bénéfices réalisés par les entreprises de navigation maritime. Paris, le 2 juin 1930.

FRANCE AND NORWAY

Exchange of Notes constituting an Agreement for the reciprocal Exemption from Income Tax of Profits accruing from the Business of Shipping. Paris, June 2, 1930.

¹ TRADUCTION. — TRANSLATION.

No. 2350. — EXCHANGE OF NOTES ² BETWEEN THE NORWEGIAN AND FRENCH GOVERNMENTS CONSTITUTING AN AGREEMENT FOR THE RECIPROCAL EXEMPTION FROM INCOME TAX OF PROFITS ACCRUING FROM THE BUSINESS OF SHIPPING. PARIS, JUNE 2, 1930.

French official text communicated by the Norwegian Minister for Foreign Affairs. The registration of this Exchange of Notes took place June 16, 1930.

I.

NORWEGIAN LEGATION.

SIR,

PARIS, June 2, 1930.

With reference to the negotiations which I have had the honour to conduct in the name of my Government with your Ministry concerning reciprocal exoneration from taxation on profits made by maritime navigation undertakings, I have the honour to inform you that the Norwegian Government is prepared to put into force the agreement set forth below, should the French Government be prepared to make an identical declaration on its side.

The Norwegian Government undertakes to levy no tax assessed on profits made by sea-going vessels flying the French flag and belonging to private persons or to companies established outside Norwegian territory.

In consequence, the income tax established by fiscal laws Nos. 8 and 9 of August 18, 1911, shall in no case be due from the said French undertakings.

The French Government on its side undertakes to levy no tax assessed on profits made in France by sea-going vessels flying the Norwegian flag and belonging to private persons or to companies established outside France.

In consequence, Norwegian shipping undertakings shall be exempted in France from the tax on industrial and commercial profits established by Chapter 1 of the Law of July 31, 1917, and from the income tax provided for by the Law of June 29, 1872, and the Decree of December 6 of the same year.

The present agreement shall take effect as from April 1, 1930.

¹ Traduit par le Secrétariat de la Société des Nations, à titre d'information.

¹ Translated by the Secretariat of the League of Nations, for information.

² In force as from April 1st, 1930.

I should be very much obliged if you would inform me as soon as possible of the reply of the French Government.

I have the honour to be, etc.,

His Excellence
Monsieur Briand,
Minister for Foreign Affairs,
etc., etc., etc.

(Signed) F. Wedel JARLSBERG.

II.

FRENCH REPUBLIC.
MINISTRY OF FOREIGN AFFAIRS.

PARIS, June 2, 1930.

SIR,

In reply to your letter of the 2nd instant, I have the honour to inform you that the French Government is prepared to put into force the agreement contained in your above-mentioned communication, and reading as follows :

The Norwegian Government undertakes to levy no tax assessed on profits made by sea-going vessels flying the French flag and belonging to private persons or to companies established outside Norwegian territory.

In consequence, the income tax established by fiscal laws Nos. 8 and 9 of August 18, 1911, shall in no case be due from the said French undertakings.

The French Government on its side undertakes to levy no tax assessed on profits made in France by sea-going vessels flying the Norwegian flag and belonging to private persons or to companies established outside France.

In consequence, Norwegian shipping undertakings shall be exempted in France from the tax on industrial and commercial profits established by Chapter 1 of the Law of July 31, 1917, and from the income tax provided for by the Law of June 29, 1872, and the Decree of December 6 of the same year.

The present agreement shall take effect from April 1st, 1930.

I have the honour to be, etc.,

Monsieur le Baron
de Wedel Jarlsberg,
Norwegian Minister,
Paris.

(Signed) A. BRIAND.