

N° 2230.

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## CANADA ET SUÈDE

Echange de notes comportant un accord relatif à l'exemption de l'impôt sur le revenu en ce qui concerne les bénéfices réalisés dans les affaires d'armement maritime. Ottawa, le 21 novembre 1929.

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## CANADA AND SWEDEN

Exchange of Notes constituting an Agreement for the Exemption from Income Tax of Profits accruing from the Business of Shipping. Ottawa, November 21, 1929.

No. 2230. — EXCHANGE OF NOTES BETWEEN THE CANADIAN AND SWEDISH GOVERNMENTS CONSTITUTING AN AGREEMENT FOR THE EXEMPTION FROM INCOME TAX OF PROFITS ACCRUING FROM THE BUSINESS OF SHIPPING. OTTAWA, NOVEMBER 21, 1929.

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*Texte officiel anglais communiqué par le " Advisory Officer " du Canada auprès de la Société des Nations et le ministre des Affaires étrangères de Suède. L'enregistrement de cet échange de notes a eu lieu le 18 décembre 1929.*

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I.

DEPARTMENT  
OF EXTERNAL AFFAIRS,  
CANADA.

OTTAWA, 21st. November 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 Canada agree to the following undertaking :

(1) In respect 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 Sweden shall not be liable to taxation.

(2) In respect of Sweden the Swedish Government undertakes that in accordance with the provisions of the Royal Ordinance of September 28th, 1928, regarding national tax on income and capital 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 earned in the year 1928 and each year thereafter. It is further agreed that the provisions of this arrangement may be terminated on the first of January of any year, subject to six months notice by either party to the other of its intention to terminate the same.

(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, Sir, Your obedient servant.

*For the Secretary of State for External Affairs :*  
(Signed) W. H. WALKER.

Magnus Clarholm, Esquire,  
Consul-General of Sweden,  
p. t. Ottawa.

Pour copie conforme :  
Stockholm,  
au Ministère royal des Affaires étrangères,  
le 16 décembre 1929.  
*Le Chef des Archives :*  
Carl Sandgren.

## II.

ROYAL CONSULATE GENERAL OF SWEDEN  
FOR  
BRITISH NORTH AMERICA.

OTTAWA, 21st. November 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 Sweden agrees to the following undertaking :

(1) In respect of Sweden the Swedish Government undertakes that in accordance with the provisions of the Royal Ordinance of September 28th, 1928, regarding national tax on income and capital 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 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 Sweden 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 income derived from the operation of the aforementioned ships shall be deemed to be effective in respect of the income earned in the year 1928 and each year thereafter. It is further agreed that the provisions of this arrangement may be terminated on the first of January of any year, subject to six months' notice by either party to the other of its intention to terminate the same.

(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, Sir, Your obedient servant.

(Signed) Magnus CLARHOLM.  
*Consul-General of Sweden.*

The Right Honourable  
The Secretary of State  
for External Affairs,  
Ottawa.

Pour copie conforme :  
le 16 décembre 1929.  
Stockholm,  
au Ministère royal des Affaires étrangères,  
*Le Chef des Archives :*  
Carl Sandgren.

Certified to be a true copy of the original :  
W. H. Walker,  
*Acting Under Secretary of State for  
External Affairs.*