

No. 6487

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**JAPAN  
and  
ARGENTINA**

**Exchange of notes constituting an arrangement concerning reciprocal exemption from taxation of income derived from the business of shipping. Tokyo, 20 December 1961**

*Official text: English.*

*Registered by Japan on 17 January 1963.*

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**JAPON  
et  
ARGENTINE**

**Échange de notes constituant un arrangement relatif à l'exonération fiscale réciproque des revenus provenant de l'exploitation de transports maritimes. Tokyo, 20 décembre 1961**

*Texte officiel anglais.*

*Enregistré par le Japon le 17 janvier 1963.*

No. 6487. EXCHANGE OF NOTES CONSTITUTING AN ARRANGEMENT<sup>1</sup> BETWEEN THE GOVERNMENT OF JAPAN AND THE GOVERNMENT OF THE ARGENTINE REPUBLIC CONCERNING RECIPROCAL EXEMPTION FROM TAXATION OF INCOME DERIVED FROM THE BUSINESS OF SHIPPING. TOKYO, 20 DECEMBER 1961

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I

Tokyo, December 20, 1961

Excellency :

I have the honour to inform you that, in order to avoid double taxation on income derived from the business of shipping and to promote commerce between Japan and the Argentine Republic, the Japanese Government is prepared to make a following arrangement with the Argentine Government :

(1) In conformity with Law No. 6, 1924, and the Ordinance concerned, the Japanese Government will exempt from income tax, corporation tax and enterprise tax chargeable in Japan, income derived from the business of shipping carried on by means of ships registered in Argentina by the Argentine Government, by an individual who is resident in Argentina but who is not resident in Japan, or by a corporation or other association which is organized under the laws of Argentina and is managed and controlled in Argentina.

(2) By exercising the power authorized under Article 10 of Law No. 11682, as adjusted in 1960, the Argentine Government will exempt from income tax and all other taxes on revenue chargeable in the Argentine Republic, income and revenue derived from the business of shipping carried on by an individual who is resident in Japan but who is not resident in Argentina, or by a corporation or other association which is organized under the laws of Japan and whose main office is in Japan, provided that such business is carried on by means of ships registered in Japan.

(3) The term " the business of shipping " means the business of transporting persons and goods carried on by an owner or a charterer of ships.

(4) The exemption of tax as provided for in paragraphs (1) and (2) shall be applied to income and revenue derived during taxable years beginning on or after the first day of January of the calendar year in which this arrangement is made.

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<sup>1</sup> Came into force on 20 December 1961 by the exchange of the said notes, with effect as specified in paragraph 4.

- (5) This arrangement shall cease to have effect—
- (a) if either Government terminates it by giving to the other Government six months' written notice; or
  - (b) if and so soon as such exemption of tax as provided for in paragraphs (1) and (2) ceases to be practicable in either Japan or Argentina because of any revision or repeal of the Laws mentioned in paragraphs (1) and (2).

I have further the honour to request Your Excellency to be good enough to confirm that the above-mentioned arrangement is acceptable to the Argentine Government.

I avail myself of this opportunity to renew to Your Excellency the assurance of my highest consideration.

Zentaro KOSAKA

His Excellency Dr. Miguel Angel Cárcano  
Minister for Foreign Affairs and Worship  
of the Argentine Republic

## II

Tokyo, December 20, 1961

Excellency :

I have the honour to acknowledge receipt of Your Excellency's Note of today's date and to confirm that the following arrangement which is stipulated in Your Excellency's Note is acceptable to the Argentine Government :

[See note I]

I avail myself of this opportunity to renew to Your Excellency the assurance of my highest consideration.

M. A. CÁRCANO

His Excellency Mr. Zentaro Kosaka  
Minister for Foreign Affairs of Japan