

No. 7287

CZECHOSLOVAKIA
and
NORWAY

Exchange of notes constituting an agreement relating to reciprocal exemption from taxes on profits, income and property derived from or connected with air transport. Prague, 25 October 1962

Official text: French.

Registered by the International Civil Aviation Organization on 8 June 1964.

TCHÉCOSLOVAQUIE
et
NORVÈGE

Échange de notes constituant un accord relatif à l'exonération réciproque des impôts sur les bénéfices et revenus ainsi que sur la fortune provenant de, ou se rattachant à, l'exercice de la navigation aérienne. Prague, 25 octobre 1962

Texte officiel français.

Enregistré par l'Organisation de l'aviation civile internationale le 8 juin 1964.

[TRANSLATION — TRADUCTION]

No. 7287. EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT¹ BETWEEN CZECHOSLOVAKIA AND NORWAY RELATING TO RECIPROCAL EXEMPTION FROM TAXES ON PROFITS, INCOME AND PROPERTY DERIVED FROM OR CONNECTED WITH AIR TRANSPORT. PRAGUE, 25 OCTOBER 1962

I

No. 217 948/62

Note Verbale

The Ministry of Foreign Affairs presents its compliments to the Royal Legation of Norway and has the honour to inform it as follows :

1. The Czechoslovak Government, acting in virtue of the powers conferred upon it by paragraph 11, sub-paragraph 1 of Act No. 145/1961 of the Collection of Laws, declares, subject to reciprocity, that Norwegian air navigation enterprises shall be exempt in the Czechoslovak Socialist Republic from all taxes on profits or income derived from air navigation in international traffic, and from the tax on fortune.

2. The exemption provided for in paragraph 1 shall also apply to Norwegian air navigation enterprises participating in an international operating agency.

3. The expression "air navigation" means the business of transporting persons or goods by air, carried on by the owners, lessees or charterers of aircraft.

4. The expression "Norwegian enterprises" means air navigation enterprises which have their actual management in Norway and are operated by individuals of Norwegian nationality resident in Norway and possessing no domicile in Czechoslovakia, or by bodies corporate—including any in which the Norwegian State has an interest—constituted in accordance with the laws in force in Norway, or by the Norwegian State.

5. The exemption provided for in paragraphs 1 and 2 shall also apply to Czechoslovak taxes levied for the period prior to the date of this declaration.

¹ Came into force on 25 October 1962 by the exchange of the said notes.

6. The Czechoslovak Government reserves the right to withdraw this declaration by giving six months' notice to the Norwegian Government ; in that event the exemption shall last apply to Czechoslovak taxes levied for the period ending on the 31 December immediately following the expiry of the said six months' notice.

The Ministry of Foreign Affairs takes this opportunity, etc.

Prague, 25 October 1962
The Royal Legation of Norway
Prague

II

Note Verbale

The Royal Legation of Norway presents its compliments to the Ministry of Foreign Affairs of the Czechoslovak Socialist Republic and has the honour to inform it as follows :

1. The Norwegian Government, acting in virtue of the powers provided for by the laws and regulations in force, declares, subject to reciprocity, that Czechoslovak air navigation enterprises shall be exempt in Norway from national and communal taxes on property connected with air navigation in international traffic, and from national and communal taxes on income derived from such enterprises.

2. The exemption provided for in paragraph 1 shall also apply to Czechoslovak air navigation enterprises participating in a pool, a joint operating arrangement or an international operating agency.

3. The expression "air navigation" means the business of transporting persons or goods by air, carried on by owners, lessees or charterers of aircraft.

4. The expression "Czechoslovak enterprises" means air navigation enterprises which have their actual management in Czechoslovakia and are operated by individuals of Czechoslovak nationality resident in Czechoslovakia and possessing no domicile in Norway, or by bodies corporate—including those in which the Czechoslovak State has an interest—constituted in accordance with the laws in force in Czechoslovakia, or by the Czechoslovak State.

5. The exemption provided for in paragraphs 1 and 2 shall also apply to Norwegian taxes levied for the period prior to the date of this declaration.

6. The Norwegian Government reserves the right to withdraw this declaration by giving six months' notice to the Czechoslovak Government ; in that event the exemption shall last apply to Norwegian taxes levied for the period ending on the 31 December immediately following the expiry of the said six months' notice.

The Legation of Norway takes this opportunity, etc.

Prague, 25 October 1962

The Ministry of Foreign Affairs
of the Czechoslovak Socialist Republic
Prague