

No. 7459

**ISRAEL
and
FRANCE**

Exchange of notes constituting an agreement concerning exemption of death duties (charitable and cultural institutions). Paris, 1 July, 2 and 20 December 1963

Official text: French.

Registered by Israel on 18 November 1964.

**ISRAËL
et
FRANCE**

Échange de notes constituant un accord concernant l'exonération d'impôts en faveur de dons et legs consentis à des institutions charitables et culturelles. Paris, 1^{er} juillet, 2 et 20 décembre 1963

Texte officiel français.

Enregistré par Israël le 18 novembre 1964.

[TRANSLATION — TRADUCTION]

No. 7459. EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT¹ BETWEEN ISRAEL AND FRANCE CONCERNING EXEMPTION OF DEATH DUTIES (CHARITABLE AND CULTURAL INSTITUTIONS). PARIS, 1 JULY, 2 AND 20 DECEMBER 1963

I

Liberty – Equality – Fraternity
FRENCH REPUBLIC
MINISTRY OF FOREIGN AFFAIRS

Conventions

Reference : CA-T-42-F-a-1² legs.

Paris, 1 July 1963

The Ministry of Foreign Affairs has the honour to inform the Embassy of Israel that the tax exemptions granted under French fiscal legislation to certain French Institutions and Associations in respect of gifts made and legacies bequeathed to them may be extended to similar foreign organizations pursuant to the principle of reciprocity.

The French Government is prepared to grant these exemptions to Israel associations and institutions having cultural or charitable aims, provided, however, that it has the assurance that French associations and institutions having the same aims enjoy similar treatment in Israel.

The Ministry of Foreign Affairs would be very grateful if the Embassy would kindly give it such an assurance.

If this assurance is forthcoming, the Ministry of Foreign Affairs suggests that if the two Governments establish that the required conditions of reciprocity are fulfilled, the system of reciprocal tax exemption in this matter shall apply from the date of the Embassy's reply and shall remain in effect so long as no change is made in French or Israel law on this point.

The Ministry of Foreign Affairs takes this opportunity, etc.

(Signed) [illegible]

Embassy of Israel
Paris

¹ Came into force on 2 December 1963, in accordance with the provisions of the said notes.

II

EMBASSY OF ISRAEL

The Embassy of Israel presents its compliments to the Ministry of Foreign Affairs and has the honour to refer to the note dated 1 July 1963 (CA-T-42-F-a-1²-legs) in which the Ministry informed the Embassy of the possibility of extending the tax exemptions granted under French law to certain French Institutions and Associations in respect of gifts made and legacies bequeathed to them to similar foreign organizations pursuant to the principle of reciprocity.

This Embassy, on the instructions of its Government, has the pleasure of informing the Ministry that the principle of reciprocity is recognized under Israel law (article 6*b* of the Estate Duty Law 5709-1949). Consequently, French Associations and Institutions having cultural or charitable aims enjoy exemption from taxation to the extent that such exemption is granted under French law to similar Israel Institutions.

The two Governments having thus established that the conditions of reciprocity are fulfilled, the system of reciprocal tax exemption shall apply from today's date and shall remain in effect so long as no change is made in the law of either country on this point.

This Embassy ventures to suggest that the above-mentioned note from the Ministry of Foreign Affairs and this note should constitute an agreement between the two Governments on this matter and would be grateful to receive confirmation of this from the Ministry.

The Embassy of Israel takes this opportunity, etc.

Paris, 2 December 1963

[SEAL]

Ministry of Foreign Affairs
Conventions
Paris

III

Liberty – Equality – Fraternity

FRENCH REPUBLIC
MINISTRY OF FOREIGN AFFAIRS

Conventions

Reference : CA-T-42-F-a-1. legs.

Paris, 20 December 1963

In its reply dated 2 December 1963 to the note from the Ministry of Foreign Affairs dated 1 July 1963, the Embassy of Israel informed the Ministry that the Israel Government was prepared, on a basis of reciprocity, to extend to French associations and institutions having cultural or charitable aims the exemptions granted under Israel law to similar Israel associations and institutions.

The Embassy expressed the wish that the two notes mentioned above should constitute the desired agreement between the two Governments on this matter.

The Ministry of Foreign Affairs has the honour to inform the Embassy of Israel that this proposal meets with the approval of the French Government.

The Ministry takes this opportunity, etc.

(Signed) [illegible]

Embassy of Israel
Paris