

No. 7772

**UNITED KINGDOM OF GREAT BRITAIN
AND NORTHERN IRELAND
and
LEBANON**

Exchange of notes constituting an agreement for the avoidance of double taxation on profits derived from shipping and air transport. Beirut, 24 October 1963

Official texts: English and Arabic.

Registered by the United Kingdom of Great Britain and Northern Ireland on 12 May 1965.

**ROYAUME-UNI DE GRANDE BRETAGNE
ET D'IRLANDE DU NORD
et
LIBAN**

Échange de notes constituant une convention tendant à éviter la double imposition des bénéfices provenant de l'exploitation de transports maritimes ou aériens. Beyrouth, 24 octobre 1963

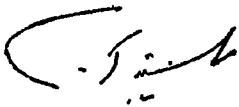
Textes officiels anglais et arabe.

Enregistré par le Royaume-Uni de Grande-Bretagne et d'Irlande du Nord le 12 mai 1965.

No. 7772. EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT¹ BETWEEN THE GOVERNMENT OF THE UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND AND THE GOVERNMENT OF THE REPUBLIC OF THE LEBANON FOR THE AVOIDANCE OF DOUBLE TAXATION ON PROFITS DERIVED FROM SHIPPING AND AIR TRANSPORT. BEIRUT, 24 OCTOBER 1963

إذا كانت حكومة المملكة المتحدة مستعدة لقبول البنود المذكورة أعلاه
فلي الشرف أن اقترح اعتبار هذه المذكرة ورد سعادتك بنفس المعنى بأنهما
يشكلان اتفاقية بين الحكومتين بصدور هذا الموضوع يبدأ بمفعولها اعتباراً من
تاريخ تسلم حكومة لبنان المذكرة المشار إليها في البند (٢) من الفقرة الأولى
من هذه المذكرة .
وتفضلوا بقبول فائق الاحترام .

رئيس مجلس الوزراء
وزير الخارجية والمغتربين بالوكالة
رشيد كرامي



¹ Came into force on 2 September 1964, in accordance with the provisions of the said notes.

[TRANSLATION¹—TRADUCTION²]

Beirut, October 24, 1963

Your Excellency,

I have the honour to inform Your Excellency that, in order to avoid double taxation of profits derived from shipping and air transport and to encourage maritime transport and commercial aviation between the United Kingdom of Great Britain and Northern Ireland and the Republic of the Lebanon, the Government of the Lebanon are prepared to conclude with the Government of the United Kingdom an agreement in the following terms :

(1) The Government of the Lebanon shall exempt all income derived from the business of shipping and air transport between the Republic of the Lebanon and other countries by United Kingdom undertakings engaged in such business from income tax and all other taxes on income or profits which are or may become chargeable in the Republic of the Lebanon.

(2) The Government of the United Kingdom shall exempt all income derived from the business of shipping and air transport between the United Kingdom and other countries by Lebanese undertakings engaged in such business from income tax and profits tax and all other taxes on income or profits which are, or may become, chargeable in the United Kingdom and shall take the necessary action under Section 347 of the Act of Parliament of the United Kingdom known as the Income Tax Act, 1952, with a view to giving the force of law to the exemption aforesaid. They shall notify the Government of the Lebanon in writing when such action has been taken.

(3) The expression "the business of shipping and air transport" means the business of transporting persons, goods or mail carried on by the owner or charterer of ships or aircraft.

(4) The expression "United Kingdom undertakings" means the Government of the United Kingdom, physical persons resident in the United Kingdom and not resident in the Republic of the Lebanon, and corporations and partnerships constituted under the laws in force in the United Kingdom and managed and controlled in the United Kingdom.

(5) The expression "Lebanese undertakings" means the Government of the Lebanon, physical persons resident in the Republic of the Lebanon and not resident in the United Kingdom, and corporations and partnerships constituted under the laws in force in the Republic of the Lebanon and managed and controlled in the Lebanon.

(6) The exemption provided for in sub-paragraph (1) above shall apply to all income earned as from the 10th of April, 1957; the exemption provided for in sub-paragraph (2) shall apply to all income earned from the 6th of April, 1957.

(7) The provisions of this Agreement may be extended, by a further Exchange of Notes between the Government of the United Kingdom and the Government of the Lebanon, to any territory for whose international relations the Government of the United Kingdom are responsible.

¹ Translation by the Government of the United Kingdom of Great Britain and Northern Ireland.

² Traduction du Gouvernement du Royaume-Uni de Grande-Bretagne et d'Irlande du Nord.

(8) This Agreement may be terminated by either Party by giving six months' notice in writing to the other Party. The termination of the Agreement by either Party shall, unless otherwise expressly agreed by both Parties, terminate the application of the agreement to any territory to which it has been extended in accordance with sub-paragraph (7) above.

If the Government of the United Kingdom are prepared to accept the foregoing provisions, I have the honour to suggest that the present Note and Your Excellency's reply in similar terms should be regarded as constituting an Agreement between the two Governments in this matter, which shall take effect upon the date of receipt by the Government of the Lebanon of the notification referred to in sub-paragraph (2) of the first paragraph of this Note.

Please accept highest respect.

Rachid KARAMEH
President, Council of Ministers
Acting Minister for Foreign Affairs and Emigrants

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*Her Majesty's Ambassador at Beirut to the Prime Minister and Acting Minister
for Foreign Affairs of the Lebanon*

BRITISH EMBASSY

Beirut, October 24, 1963

Your Excellency,

I have the honour to acknowledge receipt of Your Excellency's Note of to-day's date which reads in translation as follows :

[*See note I*]

In reply, I have the honour to inform Your Excellency that the foregoing proposals are acceptable to the Government of the United Kingdom of Great Britain and Northern Ireland, who therefore agree that your Note together with this reply should be regarded as constituting an Agreement between the two Governments in this matter, which shall take effect on the date of receipt by the Lebanese Government of the notification referred to in sub-paragraph (2) of the first paragraph of Your Excellency's Note.

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

D. M. H. RICHES