EXPLANATORY NOTE

(This Note does not form part of the Order, but is intended to indicate its general purport.)

In accordance with the Annecy agreement, this Order reduces the rate of Ottawa duty chargeable on cod liver oil imported in bulk in the manner set out in the Schedule (previously chargeable at 1s. 4d. per gallon) to 1s. per gallon, and reduces the rate of Ottawa duty on blue veined cheese and preserved cherries of the description set out in the Schedule (previously 15 per cent.) to 10 per cent.

INCOME TAX

1. *Double Taxation Relief.* | 2. *U.S.A. Securities*, p. 2326.

1. DOUBLE TAXATION RELIEF

(1) *Argentina.*
(2) *Barbados*, p. 2236.
(3) *Basutoland*, p. 2242.
(4) *Bechuanaland*, p. 2249.
(5) *Dominica*, p. 2256.
(6) *Falkland Islands*, p. 2262.
(7) *Federation of Malaya*, p. 2269.
(8) *Grenada*, p. 2276.
(9) *Jamaica*, p. 2282.
(10) *St. Lucia*, p. 2289.
(11) *St. Vincent*, p. 2296.
(12) *Singapore*, p. 2303.
(13) *Swaziland*, p. 2309.
(14) *Sweden*, p. 2316.

(1) ARGENTINA

The Double Taxation Relief (Shipping and Air Transport Profits) (Argentina) Order, 1949

1949 No. 1435

Made - - - - 28*th July*, 1949

At the Court at Buckingham Palace, the 28th day of July, 1949

Present,

The King's Most Excellent Majesty in Council

Whereas it is provided by subsection (1) of section fifty-one of the Finance (No. 2) Act, 1945(a), that if His Majesty by Order in Council declares that arrangements specified in the Order have been made with the Government of any territory outside the United Kingdom with a view to affording relief from double taxation in relation to income tax or profits tax and any taxes of a similar character imposed by the laws of that territory, and that it is expedient that those arrangements should have effect, the arrangements shall have effect to the extent specified in that subsection:

And Whereas under certain other provisions of Part V of the said Act certain other consequences ensue on the making of any such Order:

(a) 9 & 10 Geo. 6. c. 13.

And Whereas a draft of this Order was laid before the Commons House of Parliament in accordance with the provisions of subsection (2) of section fifty-six of the said Act and an Address has been presented to His Majesty by that House praying that an Order may be made in the terms of this Order:

Now, therefore, His Majesty, in exercise of the powers conferred on Him by subsection (1) of the said section fifty-one and of all other powers enabling Him in that behalf, is pleased, by and with the advice of His Privy Council, to order, and it is hereby ordered, as follows:—

1. This Order may be cited as the Double Taxation Relief (Shipping and Air Transport Profits) (Argentina) Order, 1949.

2. It is hereby declared—

(*a*) that the arrangements specified in the Schedule to this Order have been made with the Government of the Argentine Republic with a view to affording relief from double taxation in relation to income tax or profits tax and taxes of a similar character imposed by the laws of Argentina; and

(*b*) that it is expedient that those arrangements should have effect.

E. C. E. Leadbitter.

SCHEDULE

(1) The Argentine Government, in exercise of the powers conferred on them by Article 10 of Law 11,682 enacted in 1947, shall exempt all income derived from the business of sea or air transport between the Argentine Republic and other countries by United Kingdom undertakings engaged in such business from income tax and all other taxes on profits which are chargeable in the Argentine Republic.

(2) The Government of the United Kingdom shall exempt all income derived from the business of sea or air transport between the United Kingdom and other countries by Argentine undertakings engaged in such business from income tax and all other taxes on profits which are chargeable in the United Kingdom and shall take the necessary action under Section 51 of the Act of Parliament of the United Kingdom known as the Finance No. 2 Act, 1945, with a view to giving the force of law to the exemption aforesaid.

(3) The expression "the business of sea or 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 Argentine Republic, and corporations and partnerships constituted under the laws of the United Kingdom and managed and controlled in the United Kingdom.

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

(6) The exemption provided for in paragraphs (1) and (2) above shall apply to all income earned as from the 1st January, 1946.

(7) This agreement may be terminated by either party by giving six months' notice in writing to the other party.

EXPLANATORY NOTE

(This Note is not part of the Order, but is intended to indicate its general purport.)

The arrangements with Argentina which are scheduled to this Order provide that shipping and air transport profits derived from one country by a resident of the other country are (subject to certain conditions) to be exempt from tax in the former country.

The arrangements apply to profits earned on or after the 1st January, 1946.

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(2) BARBADOS

The Double Taxation Relief (Taxes on Income) (Barbados) Order, 1949

1949 No. 358

Made - - - - 4th March, 1949

At the Court at Buckingham Palace, the 4th day of March, 1949

Present,

The King's Most Excellent Majesty in Council

Whereas it is provided by subsection (1) of section fifty-one of the Finance (No. 2) Act, 1945(a), that if His Majesty by Order in Council declares that arrangements specified in the Order have been made with the Government of any territory outside the United Kingdom with a view to affording relief from double taxation in relation to income tax or profits tax and any taxes of a similar character imposed by the laws of that territory, and that it is expedient that those arrangements should have effect, the arrangements shall have effect to the extent specified in that subsection:

And Whereas under certain other provisions of Part V of the said Act certain other consequences ensue on the making of any such Order:

And Whereas a draft of this Order was laid before the Commons House of Parliament in accordance with the provisions of subsection (2) of section fifty-six of the said Act and an Address has been presented to His Majesty by that House praying that an Order may be made in the terms of this Order:

Now, therefore, His Majesty, in exercise of the powers conferred on Him by subsection (1) of the said section fifty-one and of all other powers enabling Him in that behalf, is pleased, by and with the advice of His Privy Council, to order, and it is hereby ordered, as follows:—

1. This Order may be cited as the Double Taxation Relief (Taxes on Income) (Barbados) Order, 1949.

2. It is hereby declared—

(*a*) that the arrangements specified in the Arrangement set out in the Schedule to this Order have been made with the Government of

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(a) 9 & 10 Geo. 6. c. 13.