

No. 2990

**ISRAEL
and
NORWAY**

Exchange of notes constituting an agreement for the reciprocal exemption from income tax and all other taxes on income derived from the exercise of shipping activities and the operation of aircraft services. Athens, 1 February 1955, and Jerusalem, 24 May 1955

Official text: English.

Registered by Israel on 1 November 1955.

**ISRAEL
et
NORVEGE**

Echange de notes constituant un accord tendant à exonérer réciproquement de l'impôt sur le revenu et de toutes autres impositions frappant ~~les revenus~~ les bénéfices provenant de l'exploitation d'entreprises de transports maritimes et aériens. Athènes, 1er février 1955, et Jérusalem, 24 mai 1955

Texte officiel anglais.

Enregistré par Israël le 1er novembre 1955.

No. 2990. EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT¹ BETWEEN ~~THE GOVERNMENT OF ISRAEL~~ AND ~~THE GOVERNMENT OF NORWAY~~ FOR THE RECIPROCAL EXEMPTION FROM INCOME TAX AND ALL OTHER TAXES ON INCOME DERIVED FROM THE EXERCISE OF SHIPPING ACTIVITIES AND THE OPERATION OF AIRCRAFT SERVICES. ATHENS, 1 FEBRUARY 1955, AND JERUSALEM, 24 MAY 1955

I

ROYAL NORWEGIAN LEGATION

Tel Aviv, p.t. Athens, February 1, 1955

29/6295/5

Mr. Minister,

As the Government of Norway and the Government of Israel desire to conclude an agreement for reciprocal exemption from income tax and all other taxes on income derived from the exercise of shipping activities and the operation of aircraft services, I have the honour to inform Your Excellency that the Government of Norway are prepared to conclude an agreement with the Government of Israel in the following terms:

Article 1

The Government of Norway shall exempt all income derived from the business of sea or air transport by Israel enterprises engaged in such business from income tax and all other taxes on income imposed in Norway.

Article 2

The Government of Israel shall exempt all income derived from the business of sea or air transport by Norwegian enterprises engaged in such business from income tax and all other taxes on income imposed in Israel.

Article 3

For the purpose of this agreement, the expression: "Israel enterprise" means the Government of Israel, a physical person ordinarily resident in Israel and a corporation or a partnership constituted under the Laws of and managed and controlled in Israel;

¹ Came into force on 24 May 1955, with retroactive effect from 1 January 1953, in accordance with the terms of the said notes.

“Norwegian enterprise” means the Government of Norway, a physical person ordinarily resident in Norway and a corporation or a partnership constituted under the Laws of and managed and controlled in Norway;

“Business of sea and air transport” means the business of transporting by sea or by air persons, livestock, goods or mail carried on by the owner or charterer of ships or aircraft.

Article 4

This agreement shall have effect in both countries with regard to income derived after December 1952.

Both parties have agreed to waive all taxes referred to in articles 1 and 2 unpaid and in arrears prior to the date of the signature of this agreement.

Article 5

This agreement may be terminated by either Government by giving on or before 30 June in any calendar year written notice of termination to the other Government and, in such case, the termination shall become effective on 1st January of the following year.

If the foregoing proposals are acceptable to the Government of Israel, I suggest that this note and your confirmatory reply thereto be regarded as constituting an agreement between our two Governments in this matter.

Please accept, Mr. Minister, the assurances of my highest consideration.

(Signed) I. RINDAL
Chargé d’Affaires a.i.

His Excellency Mr. Moshe Sharett
Minister for Foreign Affairs

Jerusalem

II

MINISTRY FOR FOREIGN AFFAIRS
JERUSALEM, ISRAEL

24 May 1955

Monsieur le Chargé d’Affaires,

I am directed by the Minister for Foreign Affairs to acknowledge receipt of your letter of 1 February 1955, reading as follows:

[See note I]

In reply thereto, I have the honour to state that the foregoing provisions are agreed to by the Government of Israel and that your letter and this con-

firmatory reply are regarded as constituting an agreement between our two Governments.

Please accept, Monsieur le Chargé d'Affaires, the assurances of my high consideration.

(Signed) W. EYTAN
Director General

Mr. I. Rindal
Chargé d'Affaires a.i.
Royal Norwegian Legation in Israel