

No. 8717

**DENMARK
and
LEBANON**

Exchange of notes constituting an agreement for the avoidance of double taxation on profits derived from shipping and air transport. Beirut, 29 March 1967

Official text: French.

Registered by Denmark on 4 August 1967.

**DANEMARK
et
LIBAN**

Échange de notes constituant un accord tendant à éviter la double imposition des bénéfices provenant de l'exercice de la navigation maritime et aérienne. Beyrouth, 29 mars 1967

Texte officiel français.

Enregistré par le Danemark le 4 août 1967.

[TRANSLATION — TRADUCTION]

No. 8717. EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT¹ BETWEEN DENMARK AND LEBANON FOR THE AVOIDANCE OF DOUBLE TAXATION ON PROFITS DERIVED FROM SHIPPING AND AIR TRANSPORT. BEIRUT, 29 MARCH 1967

I

ROYAL EMBASSY OF DENMARK
BEIRUT

29 March 1967

Sir,

I have the honour to inform you that, in order to avoid double taxation of income derived from the business of shipping and air transport and to encourage maritime and air transport between the Lebanese Republic and the Kingdom of Denmark, the Danish Government is prepared to conclude with the Lebanese Government an agreement in the following terms :

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

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

(3) The exemptions mentioned in paragraphs (1) and (2) shall apply to Danish or Lebanese air transport undertakings participating in pools of any kind.

(4) For the purpose of this Agreement,

(a) The expression "Lebanese undertakings" means the Lebanese Government, physical persons resident in the Lebanese Republic and not domiciled in the Kingdom of Denmark, and undertakings and companies constituted under the laws in force in Lebanon, controlled in Lebanon and having their head office in Lebanon.

¹ Came into force on 29 March 1967 upon the exchange of the said notes with retroactive effect from 1 January 1965, in accordance with paragraph 5.