

No. 31072

**VENEZUELA
and
CHILE**

**Agreement for the avoidance of double taxation with respect
to international maritime and air transport. Signed at
Caracas on 10 October 1990**

Authentic text: Spanish.

Registered by Venezuela on 1 July 1994.

**VENEZUELA
et
CHILI**

**Accord tendant à éviter la double imposition en matière
de transport maritime et aérien international. Signé à
Caracas le 10 octobre 1990**

Texte authentique : espagnol.

Enregistré par le Venezuela le 1^{er} juillet 1994.

[TRANSLATION]

AGREEMENT¹ BETWEEN THE REPUBLIC OF VENEZUELA AND
THE REPUBLIC OF CHILE FOR THE AVOIDANCE OF DOUBLE
TAXATION WITH RESPECT TO INTERNATIONAL MARITIME
AND AIR TRANSPORT

The Government of the Republic of Venezuela and the Government of the Republic of Chile, desiring to avoid double taxation in respect of earnings, revenue, income or profits derived from international maritime and air transport, have agreed as follows:

Article I

For the purposes of this Agreement:

(a) The term “international maritime and air transport enterprise” means, in the Republic of Venezuela, enterprises belonging to the Venezuelan State, and individuals who are resident or domiciled in Venezuela for all tax purposes and not resident or domiciled in the Republic of Chile, as well as corporations or partnerships established in Venezuela under Venezuelan laws whose effective place of management is located in Venezuela.

(b) The term “international maritime and air transport enterprises”, in the case of the Republic of Chile, means enterprises belonging to the Chilean State, individuals who are resident or domiciled in the Republic of Chile for all tax purposes and not resident or domiciled in Venezuela, as well as corporations or partnerships established in Chile under Chilean laws, whose effective place of management is located in Chile.

(c) The term “international transport” means the transport by sea or air of persons, animals, mail and goods.

(d) The term “Contracting State” refers to the Republic of Venezuela or the Republic of Chile, as the context of this Agreement requires.

(e) The term “competent authority” means, in the case of the Republic of Venezuela, the Sectoral Department of Revenue of the Ministry of Finance and, in the case of the Republic of Chile, the Ministry of Finance.

Article II

The earnings, revenue, income of profits which an enterprise of a Contracting State derives exclusively from international maritime or air transport shall be exempt in the other Contracting State from the taxes of that other State, as indicated in article III.

Such exemption shall also apply in the case of earnings, revenue, income or profits derived from participation in a “pool” or joint business.

¹ Came into force on 15 October 1993, the date of the last of the notifications by which the Contracting Parties informed each other of the completion of the required procedures, in accordance with article VI.