

DOUBLE TAXATION: SHIPPING PROFITS

Exchange of notes at Washington November 26, 1924, and January 23 and March 24, 1925

*Entered into force March 24, 1925; operative from August 11, 1924
Suspended December 11, 1951, by convention of June 13, 1949¹*

47 Stat. 2617; Executive Agreement Series 15

The Norwegian Minister to the Secretary of State

NORWEGIAN LEGATION
WASHINGTON, November 26, 1924

SIR:

By the note which I had the honor to address to the Acting Secretary of State on February 28, 1922,² and Your Excellency's note of November 14, 1922,² it was established that reciprocal exemption of income and excess and war profits taxes existed for a non-resident Norwegian or Norwegian corporation in the United States, and for a non-resident American or American corporation in Norway, with regard to income consisting exclusively of earnings derived from the operation of ships under their respective flags; see Norwegian Taxation Laws of August 18, 1911, and the United States Revenue Act of 1921, section 213(b)(8).³

By new taxation laws enacted in Norway on August 11, 1924, an amendment has been made to the exemption provisions of the laws of August 18, 1911. I hereby enclose a copy of the new laws and a translation into English of the amended provisions according to which persons, companies and corporations belonging in a foreign country are exempt from taxes on property in and income from ship[s] engaged in traffic on a Norwegian port or between Norwegian ports and from taxes from income arising from the sale of tickets for the transportation of persons out of the kingdom; provided that Norwegian persons, companies and corporations are exempt in the country in question from taxes on corresponding activities.

¹ 2 UST 2323; TIAS 2357.

² *Ante*, p. 467.

³ 42 Stat. 239.