

May 22, 1989

**PROTOCOL BETWEEN THE GOVERNMENT OF THE REPUBLIC OF THE PHILIPPINES AND THE GOVERNMENT OF THE KINGDOM OF NORWAY, AMENDING THE CONVENTION FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME AND ON CAPITAL, SIGNED IN MANILA ON 9 JULY 1987.**

The Government of the Republic of the Philippines and the Government of the Kingdom of Norway, desiring to conclude a protocol to amend the Convention between Contracting States for the Avoidance with respect to Taxes on Income and on Capital, signed in Manila on 9 July 1987 (hereinafter referred to as "The Convention"), have agreed as follows:

**ARTICLE I**

Article 15 paragraph 3 of the Convention shall be deleted and replaced by the following:

"3. Notwithstanding the preceding provisions of this Article, remuneration derived in respect of an employment exercised aboard a ship or aircraft operated in international traffic may be taxed in the Contracting State of which the operator is a resident. However, remuneration derived in respect of an employment exercised aboard a ship registered in the Norwegian International Ships' Register (N.I.S.) shall be taxable only in the Contracting State of which the recipient is a resident. Where a resident of Norway derives remuneration in respect of an employment exercised aboard an aircraft operated in international traffic by the Scandinavian Airlines System (SAS) consortium, such remuneration shall be taxable only in Norway."

**ARTICLE II**

Article 29, paragraph 2 of the Convention shall be deleted and replaced by the following:

"2. The Convention shall enter into force upon the exchange of instruments of ratification and its provisions shall have effect in respect of taxes on income or on capital relating to the calendar year (including accounting periods beginning in any such year) in which the Convention enters into force."

**ARTICLE III**

This Protocol shall be ratified and the instruments of ratification shall be exchanged at Manila as soon as possible. The Protocol shall enter into force upon the exchange of instruments of ratification and its provisions become effective in respect of taxes on income or on capital relating to the calendar year (including accounting periods beginning in any such year) in which the Convention signed in Manila on 9 July 1987 enters into force.

**ARTICLE IV**

This Protocol shall remain in force as long as the Convention remains in force.