

SECOND PROTOCOL TO THE AGREEMENT BETWEEN THE GOVERNMENT OF NEW ZEALAND AND THE GOVERNMENT OF FIJI FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME

The Government of New Zealand and the Government of Fiji

Desiring to conclude a second Protocol to the Agreement between the Contracting States for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, signed at Wellington on 27 October 1976, (hereinafter referred to as "the Agreement"),

Have agreed as follows:

Article I

Notwithstanding the provisions of Article 10 of the Agreement, interest derived and beneficially owned by the Reserve Bank of a Contracting State and which has its source in the other Contracting State, shall be exempt from tax in that other Contracting State.

Article II

- 1. The Contracting States shall notify each other through diplomatic channels that the constitutional requirements for the entry into force of this Protocol have been complied with.
- 2. The Protocol shall enter into force on the date of the later of the notifications referred to in paragraph 1 and its provisions shall have effect:

(a) in Fiji :

in respect of interest derived during any income year beginning on or after 1 January in the calendar year next following the date on which the Protocol enters into force;

(b) in New Zealand :

in respect of interest derived during any income year beginning on or after 1 April in the calendar year next following the date on which the Protocol enters into force.

IN WITNESS WHEREOF the undersigned duly authorised thereto, have signed this Protocol.

DONE in duplicate at Suva this fifteenth day of December 1986 in the English language.

For the Government of New Zealand

For the Government of Fiji

Nick Adams
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K. K. T. Mawa
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