

Ministry of Foreign Affairs Nbinister

Your Excellency,

I have the honour to acknowledge receipt of Your Excellency's Note of today's date, which reads as follows:

"I have the honour to refer to the contacts between our two Governments, relating to the provisional application between the Kingdom of Norway and the Republic of Croatia of the Convention between the Kingdom of Norway and the Socialist Federal Republic of Yugoslavia for the avoidance of double taxation with respect to taxes on income and capital, signed at Oslo on 1 September 1983. I have the honour to inform Your Excellency that the Government of Kingdom of Norway is prepared to conclude with the Government of the Republic of Croatia an agreement which is proposed to be worded as follows:

- 1. Negotiation on a Convention for the avoidance of double taxation and the prevention of fiscal evasion between the Kingdom of Norway and the Republic of Croatia shall be opened as soon as possible.
- 2. As an interim measure, the provisions of the Convention between the Kingdom of Norway and the Socialist Federal Republic of Yugoslavia for the avoidance of double taxation with respect to taxes on income and capital, signed at Oslo on 1 September 1983, shall be applied between the Kingdom of Norway and the Republic of Croatia from the entry into force of this Agreement.
- 3. Nothing in this Agreement shall, in the relations between the Kingdom of Norway and the Republic of Croatia, prejudice any question relating to treaty succession or negotiation or conclusion of a convention as referred to in paragraph 1.
- 4. This Agreement shall not apply to individuals being residents of the Kingdom of Norway that derive wages or salaries from the Government of the Kingdom of Norway or a political subdivision thereof for the dependant personal services rendered in the Republic of Croatia.
- 5. This Agreement may be terminated by either Parties by giving written notice through diplomatic channels. The Agreement shall remain in force until the expiration of the thirtieth day from the date of such notice.

If the foregoing proposals is acceptable to the Government of the Republic of Croatia, I have the honour to suggest that the present Note, together with Your Excellency's reply to that effect, should be regarded as constituting an Agreement between our two Governments, which shall enter into force upon receipt of Your Excellency's reply to that effect.

I avail myself of this opportunity to renew to Your Excellency the assurance of my highest consideration."

In reply, I have the honour to inform Your Excellency that this proposal is acceptable to the Government of the Republic of Croatia, who will regard Your Excellency's Note and this reply as constituting an Agreement between our two Governments.

I avail myself of this opportunity to renew to Your Excellency the assurance of my highest consideration."

Oslo, 6 March 1996

M. Juie Dr. Mate Granić Minister of Foreign Affairs

His Excellency Mr. Bjørn Tore Godal Minister of Foreign Affairs Oslo