

Distr.: Restricted
30 October 2007

ENGLISH ONLY

Economic and Social Council
Committee of Experts on International
Cooperation in Tax Matters
Third session
Geneva, 29 October-2 November 2007

Proposal for amendments to article 5 of the United Nations
Model Double Taxation Convention between developed and developing countries

consequence of special circumstances (e.g. death of the taxpayer, investment failure), it was prematurely liquidated.

Quoted paragraph 7

For the existing text substitute

7. For a place of business to constitute a permanent establishment the enterprise using it must carry on its business wholly or partly through it. As stated in paragraph 3 above, the activity need not be of a productive character. Furthermore, the activity need not be permanent in the sense that there is no interruption of operation, but operations must be carried out on a regular basis.

- - - - -