



TREATY SERIES 1955
N° 21

**Agreement between Ireland and Sweden for the
Avoidance of Double Taxation of Income derived from
the Business of Sea and Air Transport**

Done at Dublin on 18 October 1954

Entered into force on 25 May 1955

Presented to Dáil Éireann by the Minister for Foreign Affairs

**AGREEMENT BETWEEN THE ROYAL SWEDISH GOVERNMENT AND
THE GOVERNMENT OF IRELAND FOR THE AVOIDANCE OF DOUBLE
TAXATION OF INCOME DERIVED FROM THE BUSINESS
OF SEA AND AIR TRANSPORT**

The Royal Swedish Government and the Government of Ireland, considering the Agreement of the 8th October, 1931, between their two countries for the reciprocal exemption from taxation of the business of shipping, and, being desirous of extending the reciprocal exemption from taxation to the business of air transport,

HAVE AGREED to substitute, for the above-mentioned Agreement, an Agreement in the following terms:

Article 1

In the present Agreement:

(a) the term “Irish undertakings” means the Government of Ireland, physical persons resident in Ireland and not resident in the Kingdom of Sweden, and corporations and partnerships constituted under the laws of Ireland and managed and controlled in Ireland;

(b) the term “Swedish undertakings” means the Royal Swedish Government, physical persons resident in the Kingdom of Sweden and not resident in Ireland, and corporations and partnerships constituted under the laws of the Kingdom of Sweden and managed and controlled in the Kingdom of Sweden;

(c) the term “business of sea or air transport” means the business of transporting persons, goods or mail carried on by the owner or charterer of ships or aircraft.

Article 2

(1) All income derived from the business of sea or air transport between Ireland and other countries by Swedish undertakings engaged in such business shall be exempt from income tax and all other taxes on profits which are chargeable in Ireland.

(2) All income derived from the business of sea or air transport between the Kingdom of Sweden and other countries by Irish undertakings engaged in such business shall be exempt from income tax and all other taxes on profits which are chargeable in the Kingdom of Sweden.

Article 3

(1) The present Agreement shall be ratified and the instruments of ratification shall be exchanged at Dublin as soon as possible.

(2) The Agreement shall come into force on the date of exchange of instruments of ratification and shall thereupon have effect in respect of income earned as from the 1st January, 1954.

(3) The Agreement of the 8th October, 1931, for the reciprocal exemption from taxation of the business of shipping shall cease to have effect upon the coming into force of the present Agreement.

Article 4

This Agreement may be terminated by either party by giving six months' notice in writing to the other party.

DONE in duplicate the 18th day of October 1954.

For the Royal Swedish Government:
F. WENNERBERG

For the Government of Ireland:
Liam COSGRAVE