

EXPLANATORY NOTE

(This note is not part of the Order)

The Schedule to this Order contains an agreement (“the Agreement”) between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of the Federative Republic of Brazil for the avoidance of double taxation. This Order brings the Agreement into effect.

The Agreement aims to eliminate the double taxation of income derived by a member of the crew of an aircraft operated in international traffic. This is done by allocating the taxing rights that each country has under its domestic law over the same income solely to the country of residence.

Article 1 provides for citation.

Article 2 makes a declaration as to the effect and content of the Agreement.

The Agreement will enter into force on the date of the later of the notifications by each country of the completion of its legislative procedures. It will take effect as follows:

- (a) in the United Kingdom for any year of assessment beginning on or after 6th April next following the date of entry into force; and
- (b) in Brazil with respect to salaries, wages and other remuneration arising in the taxable year beginning on or after 1st January next following the date of entry into force.

The date of entry into force will, in due course, be published in the *London, Edinburgh and Belfast Gazettes*.

A Tax Information and Impact Note has not been prepared for this Order as it gives effect to a previously announced policy to enact a double taxation agreement.