

ARTICLE 28
ENTRY INTO FORCE

1. Each of the Territories shall notify the other in writing of the completion of the procedures required by its law for the bringing into force of this Agreement. This Agreement shall enter into force on the date of the later of these notifications and shall thereupon have effect:

- a) in Guernsey:
 - (i) in respect of taxes withheld at source, for amounts paid or credited on or after the first day of the second month next following the date on which this Agreement enters into force;
 - (ii) in respect of income tax, for any year of charge beginning on or after 1st January next following the date on which this Agreement enters into force;
- b) in the United Kingdom:
 - (i) in respect of taxes withheld at source, for amounts paid or credited on or after the first day of the second month next following the date on which this Agreement enters into force;
 - (ii) in respect of income tax and capital gains tax, for any year of assessment beginning on or after 6th April next following the date on which this Agreement enters into force;
 - (iii) in respect of corporation tax, for any financial year beginning on or after 1st April next following the date on which this Agreement enters into force.

2. Notwithstanding the provisions of paragraph 1:

- a) the provisions of Article 25 (Mutual agreement procedure) and Article 26 (Exchange of information) shall have effect from the date of entry into force of this Agreement, without regard to the taxable period to which the matter relates; and
- b) the provisions of Article 27 (Assistance in the collection of taxes) shall have effect from the date specified in an exchange of letters, without regard to the taxable period to which the matter relates.

3. The 1955 Arrangement between Guernsey and the United Kingdom of Great Britain and Northern Ireland for the avoidance of double taxation with respect to taxes on income, as amended, shall cease to have effect in respect of relief from any tax with effect from the date upon which this Agreement has effect in respect of that tax in accordance with the provisions of paragraph 1 of this Article and shall terminate on the last such date.