

legitimate commercial interests of any Investor.

- (3) Each Contracting Party shall designate one or more enquiry points to which requests for information about the abovementioned laws, regulations, judicial decisions and administrative rulings may be addressed and shall communicate promptly such designation to the Secretariat which shall make it available on request.

ARTICLE 21

Taxation

(1) Except as otherwise provided in this Article, nothing in this Treaty shall create rights or impose obligations with respect to Taxation Measures of the Contracting Parties. In the event of any inconsistency between this Article and any other provision of the Treaty, this Article shall prevail to the extent of the inconsistency.

(2) Article 7(3) shall apply to Taxation Measures other than those on income or on capital, except that such provision shall not apply to:

(a) an advantage accorded by a Contracting Party pursuant to the tax provisions of any convention, agreement or arrangement described in subparagraph (7)(a)(ii); or

(b) any Taxation Measure aimed at ensuring the effective collection of taxes, except where the measure of a Contracting Party arbitrarily discriminates against Energy Materials and Products originating in, or destined for the Area of another Contracting Party or arbitrarily restricts benefits accorded under Article 7(3).

(3) Article 10(2) and (7) shall apply to Taxation Measures of the Contracting Parties other than those on income or on capital, except that such provisions shall not apply to:

(a) impose most favoured nation obligations with respect to advantages accorded by a Contracting Party pursuant to the tax provisions of any convention, agreement or arrangement described in subparagraph (7)(a)(ii) or resulting from membership of any Re-

mercielle interesser.

3. Hver kontraherende part udpeger et eller flere informationskontorer, hvortil anmodninger om oplysninger om de ovennævnte love, bestemmelser, retslige afgørelser og administrative regler kan rettes, og meddele straks resultatet af udpegningen til Sekretariatet, som giver oplysninger herom efter anmodning.

ARTIKEL 21

Beskattning

1. Med forbehold af denne artikel, indføres der ikke ved denne traktat rettigheder eller forpligtelser vedrørende de kontraherende parters skattemæssige foranstaltninger. I tilfælde af uoverensstemmelse mellem denne artikel og andre bestemmelser i denne traktat, har denne artikel forrang.

2. Artikel 7, stk. 3, gælder for skattemæssige foranstaltninger, medmindre de vedrører indkomst eller kapital; dog gælder bestemmelsen ikke for:

a) en fordel indrømmet af en kontraherende part i henhold til de skattemæssige bestemmelser i en konvention, aftale eller et arrangement som beskrevet i stk. 7, litra a), nr. ii), eller

b) skattemæssige foranstaltninger, som skal sikre effektiv skatteinddrivning, medmindre en kontraherende parts foranstaltninger vilkårligt diskriminerer energimaterialer og produkter med oprindelse i eller bestemt for en anden kontraherende part eller vilkårligt begrænser fordele indrømmet i henhold til artikel 7, stk. 3.

3. Artikel 10, stk. 2 og 7, gælder for de kontraherende parters skattemæssige foranstaltninger, medmindre de vedrører indkomst og kapital, idet disse bestemmelser dog ikke gælder for:

a) pålæggelse af mestbegunstigelsesbedehandlingsforpligtelser med hensyn til fordele, som er indrømmet af en kontraherende part i henhold til skattemæsserne i en konvention, aftale eller et arrangement, som beskrevet i stk. 7, litra a), nr. ii), eller som hidrører fra