

Republic of the Philippines  
Congress of the Philippines

Senate

Manila City

Fourteenth Congress

Second Regular Session



RESOLUTION NO. 117

RESOLUTION CONCURREN IN THE  
RATIFICATION OF THE PROTOCOL  
AMENDING THE CONVENTION BETWEEN  
THE REPUBLIC OF THE PHILIPPINES AND  
JAPAN FOR THE AVOIDANCE OF DOUBLE  
TAXATION AND THE PREVENTION OF  
FISCAL EVASION WITH RESPECT TO TAXES  
ON INCOME

WHEREAS, the Protocol Amending the Convention  
Between the Republic of the Philippines and Japan for the  
Avoidance of Double Taxation and the Prevention of Fiscal  
Evasion with Respect to Taxes on Income was signed on  
9 December 2006 in Manila;

WHEREAS, the Protocol will reflect the importance of the economic relationship between the two countries and is expected to further strengthen economic ties;

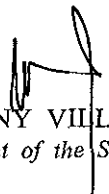
WHEREAS, the Protocol will partially amend the current Income Tax Treaty, which was signed in Tokyo on 13 February 1980. The Protocol will reduce the withholding taxes imposed on dividends, interest and royalties paid between the two countries. It will also expand the scopes of the tax sparing credit while introducing a time limitation on its availability;

WHEREAS, in a hearing conducted by the Committee on Foreign Relations on 8 May 2008, representatives of the Department of Foreign Affairs (DFA), Bureau of Internal Revenue (BIR), Philippine Association of Service Importers (PASEI), and Overseas Workers Welfare Administration (OWWA) endorsed the concurrence in the ratification of the Protocol;


WHEREAS, pursuant to the Constitution, Article 7, Section 21, "*No treaty or international agreement shall be valid and effective unless concurred in by at least two-thirds of all the Members of the Senate*": Now, therefore, be it

*Resolved*, That the Senate of the Philippines concur, as it hereby concurs, in the ratification of the Protocol Amending the Convention Between the Republic of the Philippines and Japan for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income.

Adopted,

  
MANNY VILLAR  
President of the Senate

This Resolution was adopted by the Senate on September 15, 2008.

  
EMMA LIRIO-REYES  
Secretary of the Senate  
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