



The Hon Dan Tehan MP
Minister for Trade, Tourism and Investment

Parliament House
CANBERRA ACT 2600

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2 April 2022

Shri Piyush Goyal
Honourable Minister of Commerce & Industry,
Consumer Affairs, Food & Public Distribution and Textiles
Government of India
Ministry of Commerce and Industry
Udyog Bhawan, New Delhi
110011, INDIA

Dear Minister Goyal

In connection with the signing of the Australia-India Economic Cooperation and Trade Agreement ("the Agreement"), I have the honour to confirm the following understandings reached between the Government of Australia and the Government of the Republic of India ("the Parties"):

1. The Government of Australia has agreed to amend Australian domestic taxation law to stop the taxation of offshore income of Indian firms providing technical services to Australia. This would resolve the issue that the Indian Government has raised about the Double Taxation Avoidance Agreement between the Government of the Republic of India and the Government of Australia for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, done at Canberra on 25 July 1991.
2. Australia will implement the amendments to its taxation legislation referred to in paragraph 1 in a similar time period as the Agreement.

I have the honour to propose that this letter and your letter in reply confirming that your Government shares these understandings, which will come into effect on the date on which the Agreement enters into force, shall constitute an integral part of the Agreement.

Yours sincerely

DAN TEHAN