
INTERNATIONAL TAX PLANNING

Co-editors: Lincoln Schreiner* and Michael Maikawa**

NAVIGATING THE NEW BILATERAL LIMITATION-ON-BENEFITS RULE

*Kara Ann Selby***

In this paper, the author provides a general explanation of the limitation-on-benefits article, examines selected practical problems in its application, highlights areas in which additional guidance is required, identifies potential problems and anomalies that taxpayers may encounter in applying the new rules, and makes certain recommendations.

KEYWORDS: TREATY ■ TREATY SHOPPING ■ WITHHOLDING TAXES ■ CAPITAL GAINS ■ BENEFITS ■ RESIDENCE

* Of PricewaterhouseCoopers LLP, Vancouver.

** Of PricewaterhouseCoopers LLP, Toronto.