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Subject: Renegotiation of NZ tax treaty. Section 22

Hi Section 22

Please find attached a comparison of the Australian Draft and the current treaty with some of the likely issues that will have to be covered. I have also attached the AD sent to NZ and briefs completed to date.

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Sections 33(a)(iii) and 33(b)

Sections 33(a)(iii) and 33(b)

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