



Draft TR 2024/D3 and Schedule 3 of PCG 2024/D3 published

Provide feedback on TR 2024/D3 Application of thin capitalisation third-party debt test and Schedule 3 of PCG 2024/D3.

Published 4 December 2024

We've published Draft Taxation Ruling TR 2024/D3 Application of thin capitalisation third-party debt test and Schedule 3 of Draft Practical Compliance Guideline PCG 2024/D3. These form part of our comprehensive suite of public advice and guidance products to assist impacted taxpayers following the enactment of the *Treasury Laws Amendment (Making Multinationals Pay Their Fair Share—Integrity and Transparency) Act 2024* (the Act) on 8 April 2024.

The draft ruling sets out the Commissioner's view on certain interpretative issues in relation to the thin capitalisation Third Party Debt Test (TPDT).

The additional Schedule 3 of PCG 2024/D3 provides guidance on compliance risks associated with restructures in response to the changes in the Act relating to the TPDT and other new thin capitalisation rules and should be read in conjunction with the draft compliance guideline previously released on 8 October 2024.

Both the TR 2024/D3 and Schedule 3 of PCG 2024/D3 are open for public comment until 7 February 2025. Refer to the instructions section in both products to submit your comments.

See also our latest web guidance on the [Thin capitalisation rules](#).

QC 103514

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