



## Notice of Withdrawal

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Income tax: captive insurance companies -  
deductibility of premiums and the appropriate basis  
of assessment

Draft Taxation Ruling TR 94/D36 is withdrawn with effect from  
today.

The Ruling has been withdrawn because its reasoning is contrary to  
the decision in *WD & HO Wills (Australia) Pty Ltd v. FC of T*  
96 ATC 4223; 22ATR 168. The Commissioner though reserves the  
right to test judicially any captive insurance company case which  
exhibits blatant or objectionable features.

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**Commissioner of Taxation**

19 January 2000

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ATO references:

NO 99/15852-2

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