



***CR 2005/11W - Income tax: scrip for scrip roll-over:  
exchange of ordinary shares and options in Metcash  
Trading Limited for ordinary shares and options in  
The Newco Project X Limited***

 This cover sheet is provided for information only. It does not form part of *CR 2005/11W - Income tax: scrip for scrip roll-over: exchange of ordinary shares and options in Metcash Trading Limited for ordinary shares and options in The Newco Project X Limited*

 This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2005*



## Class Ruling

Income tax: scrip for scrip roll-over:  
exchange of ordinary shares and options  
in Metcash Trading Limited for ordinary  
shares and options in The Newco  
Project X Limited

---

### *Preamble*

*The number, subject heading, **What this Class Ruling is about** (including **Tax law(s)**, **Class of persons** and **Qualifications** sections), **Date of effect**, **Arrangement** and **Ruling** parts of this document are a 'public ruling' in terms of Part IVAAA of the **Taxation Administration Act 1953**. CR 2001/1 explains Class Rulings and Taxation Rulings TR 92/1 and TR 97/16 together explain when a Ruling is a 'public ruling' and how it is binding on the Commissioner.*

## Withdrawal

---

1. This Ruling is withdrawn and ceases to have effect after 30 June 2005.

---

**Commissioner of Taxation**  
16 March 2005

---

### *Previous draft:*

Not previously issued as a draft

### *Related Rulings/Determinations:*

TR 92/1; TR 97/16; CR 2001/1

### *Subject references:*

- arrangement
- capital proceeds
- CGT event
- company
- cost base
- interests
- ordinary share
- original interest
- replacement interest
- resident
- roll-over
- roll-over relief

- scrip

- scrip for scrip

- share

- shareholder

- takeover

### *Legislative references:*

- ITAA 1936 6(1)
- ITAA 1997 Subdiv 124-M
- ITAA 1997 124-780(1)(a)(i)
- ITAA 1997 124-780(1)(a)(ii)
- ITAA 1997 124-780(1)(b)
- ITAA 1997 124-780(1)(c)
- ITAA 1997 124-780(2)(a)
- ITAA 1997 124-780(2)(b)
- ITAA 1997 124-780(2)(c)
- ITAA 1997 124-780(3)(a)
- ITAA 1997 124-780(3)(b)
- ITAA 1997 124-780(3)(c)

# CR 2005/11

- |                           |                         |
|---------------------------|-------------------------|
| - ITAA 1997 124-780(3)(d) | - ITAA 1997 124-810     |
| - ITAA 1997 124-780(4)(a) | - ITAA 1997 170-260     |
| - ITAA 1997 124-780(4)(b) | - Copyright Act 1968    |
| - ITAA 1997 124-780(5)    | - Corporations Act 2001 |
| - ITAA 1997 124-795(2)(a) | - TAA 1953 Pt IVAAA     |
| - ITAA 1997 124-795(2)(b) |                         |
- 

## ATO references

NO: 2005/3412

ISSN: 1445-2014