


TR 2013/D7W - Income tax: apportionment of expenses incurred by a superannuation entity only partly in gaining its assessable income

 This cover sheet is provided for information only. It does not form part of *TR 2013/D7W - Income tax: apportionment of expenses incurred by a superannuation entity only partly in gaining its assessable income*



Notice of Withdrawal

Taxation Ruling

Income tax: apportionment of expenses incurred by a superannuation entity only partly in gaining its assessable income

Draft Taxation Ruling TR 2013/D7 is withdrawn with effect from today.

1. TR 2013/D7 discusses how a superannuation entity apportions a loss or outgoing that is only partly deductible under section 8-1 of the *Income Tax Assessment Act 1997* (ITAA 1997) where it is only partly incurred in gaining or producing the entity's assessable income.
2. The Ruling also considers the potential effect of subsection 295-95(1) of the ITAA 1997 on such apportionment. Subsection 295-95(1) enables a superannuation fund to include all contributions in its assessable income for the purposes of claiming deductions for expenses related to obtaining contributions.
3. Taxation Ruling TR 93/17 *Income tax: income tax deductions available to superannuation funds* has been amended and now includes the key principles set out in TR 2013/D7.
4. Consequently, TR 2013/D7 has been replaced by the amended version of TR 93/17 which issued today.

Commissioner of Taxation
17 May 2017

ATO references

NO: 1-56NFCOI
ISSN: 2205-6122

© AUSTRALIAN TAXATION OFFICE FOR THE
COMMONWEALTH OF AUSTRALIA

You are free to copy, adapt, modify, transmit and distribute this material as you wish (but not in any way that suggests the ATO or the Commonwealth endorses you or any of your services or products).