


TD 2005/D27W - Withdrawal - Income tax: consolidation: capital gains: do the core consolidation rules in Division 701 of the Income Tax Assessment Act 1997 modify the effect of the CGT contract rules if an entity contracts to sell or buy a CGT asset and the contract settles after the entity becomes, or ceases to be, a member of a consolidated group?

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Notice of Withdrawal

Draft Taxation Determination

Income tax: consolidation: capital gains: do the core consolidation rules in Division 701 of the *Income Tax Assessment Act 1997* modify the effect of the CGT contract rules if an entity contracts to sell or buy a CGT asset and the contract settles after the entity becomes, or ceases to be, a member of a consolidated group?

Draft Taxation Determination TD 2005/D27 is withdrawn with effect from today.

1. Draft Taxation Determination TD 2005/D27 considered whether the core consolidation rules in Division 701 of the *Income Tax Assessment Act 1997* modify the effect of the CGT contract rules if an entity contracts to sell or buy a CGT asset and the contract settles after the entity becomes, or ceases to be, a member of a consolidated group.
2. The issue covered in this Determination is now dealt with in Draft Taxation Determination TD 2008/D9, which issued today. This allows TD 2008/D9 and Draft Taxation Determinations TD 2008/D10 and TD 2008/D11 – which also deal with issues related to straddle contracts – to be considered together as a package.

Commissioner of Taxation

25 June 2008

ATO references

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