



***GSTA TPP 019 - Goods and services tax: Are sales of section 100-5 vouchers, commonly referred to as face value vouchers (FVVs), to retail outlets and subsequent sales of the same vouchers to customers taxable supplies?***

 This cover sheet is provided for information only. It does not form part of *GSTA TPP 019 - Goods and services tax: Are sales of section 100-5 vouchers, commonly referred to as face value vouchers (FVVs), to retail outlets and subsequent sales of the same vouchers to customers taxable supplies?*

 This document has changed over time. This is a consolidated version of the ruling which was published on *14 June 2005*



## Goods and Services Tax Advice

**Goods and services tax:** Are sales of section 100-5 vouchers, commonly referred to as face value vouchers (FVVs), to retail outlets and subsequent sales of the same vouchers to customers taxable supplies?

### Preamble

*This document is a ruling for the purposes of section 37 of the Taxation Administration Act 1953. It illustrates the principles contained in **Goods and Services Tax Ruling GSTR 2003/5 on vouchers**. You can rely on the information presented in this document, which provides advice on the operation of the GST system.*

### Answer

No. The sales of section 100-5 vouchers, commonly referred to as face value vouchers (FVVs), to retail outlets and their subsequent sale to customers are not taxable supplies under subsection 100-5(1) of the *A New Tax System (Goods and Services Tax) Act 1999* (GST Act).

### Background

An entity sells FVVs to various retail outlets that sell them to their customers. The entity may or may not be the supplier of the goods and services made on redemption of the FVV

### Explanation

A FVV may be supplied through various entities before it comes into the possession of the holder who uses it to obtain supplies. Each supply of a FVV between intermediate entities is a supply to which section 100-5 applies.

Division 100 provides that, except where subsection 100-5(2) applies, the supplies of the FVVs by the entity to a retail outlet and by the retail outlet to a customer for consideration are not taxable supplies. No GST is payable for those supplies. GST is payable by the supplier of the supplies made on redemption of the FVV if those supplies are taxable supplies.

### Application of this GST Advice

This Advice is based on GSTR 2003/5. It explains our view of the law as it applied from 1 July 2000. You can rely on this Advice on and from its date of issue for the purposes of section 37 of the *Taxation Administration Act 1953*. Goods and Services Tax Ruling GSTR 1999/1 explains the GST rulings system and our view of when you can rely on our interpretation of the law in GST public and private rulings.

If this Advice conflicts with a previous private ruling that you have obtained, this public ruling prevails. However, if you have relied on a private ruling, you are protected in respect of what you have done up to the date of issue of this public ruling. This means that if you have underpaid an amount of GST, you are not liable for the shortfall prior to the date of issue of this later ruling. Similarly, you are not liable to repay an amount overpaid by the Commissioner as a refund.

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**Commissioner of Taxation**  
Date

#### Subject references:

face value vouchers  
taxable supplies

#### Legislative references:

ANTS(GST)A 1999 9-5  
ANTS(GST)A 1999 Div 100  
ANTS(GST)A 1999 100-5  
ANTS(GST)A 1999 100-5(2)  
TAA 1953 37

#### ATO references

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