

IT 2479W - Income tax: application of thin capitalisation rules



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Notice of Withdrawal

Taxation Ruling

Income tax : application of thin capitalisation rules

Taxation Ruling IT 2479 is withdrawn with effect from 10 April 2025.

1. This Ruling considers practical aspects of the operation of the thin capitalisation rules in former Division 16F of the *Income Tax Assessment Act 1936*.
2. This Ruling is withdrawn as it no longer reflects current law.
3. Former Division 16F of the *Income Tax Assessment Act 1936* was repealed in 2001, and replaced by Division 820 of the *Income Tax Assessment Act 1997*. The thin capitalisation rules in Division 820 have since again been amended by the *Treasury Law Amendment (Making Multinationals Pay Their Fair Share—Integrity and Transparency) Act 2024*, for income years commencing on or after 1 July 2023, with the exception of new integrity rules (debt deduction creation rules) which apply in relation to assessments for income years starting on or after 1 July 2024.

Commissioner of Taxation
9 April 2025

ATO references

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