

PR 1999/31W - Income tax: Australian Blue Gum Project 1999

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 This document has changed over time. This is a consolidated version of the ruling which was published on 1 July 2000



Product Ruling

Income tax: Australian Blue Gum Project 1999

Preamble

*The number, subject heading, and the **What this Product Ruling is about** (including **Tax law(s)**, **Class of persons and Qualifications** sections), **Date of effect**, **Withdrawal**, **Arrangement** and **Ruling** parts of this document are a 'public ruling' in terms of Part IVAAA of the **Taxation Administration Act 1953**. Product Ruling PR 98/1 explains Product 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 This Product Ruling is withdrawn and ceases to have effect after 30 June 2000. The Ruling continues to apply, in respect of the tax law(s) ruled upon, to all persons within the specified class who enter into the specified arrangement during the term of the Ruling. Thus, the Ruling continues to apply to those persons, even following its withdrawal, who entered into the specified arrangement prior to withdrawal of the Ruling. This is subject to there being no material difference in the arrangement or in the persons' involvement in the arrangement.

Commissioner of Taxation

19 May 1999

Previous draft:

No draft issued

- plantation forestry
- primary production
- primary production expenses

Related Rulings/Determinations:

PR 98/1; TR 92/1; TR 97/11;
TR 97/16; TD 93/34

- producing assessable income
- product rulings
- public rulings
- schemes and shams

Subject references:

- afforestation expenses
- carrying on a business
- commencement of business
- fee expenses
- forestry
- interest expenses
- management fees expenses

- taxation administration
- tax avoidance
- tax benefits under tax avoidance schemes

- tax shelters

- tax shelters project

- timber industry

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Legislative references:

- ITAA1936 82KL
- ITAA1936 82KZM
- ITAA1936 Pt IVA
- ITAA1936 177A
- ITAA1936 177C
- ITAA1936 177D

- ITAA1997 8-1

Case references:

- *Coles Myer Finance Ltd v FCT*
(1993) 176 CLR 640; (1993) 25
ATR 95; 93 ATC 4214

ATO references:

NO 99/2151-6

BO PUL 84573

FOI number: I 1015647

ISSN: 1039-0731

Price: \$1.20