

# ***PR 2000/103W - Income tax: The Port Robe Estate Vineyard Project***

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 This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2003*



## Product Ruling

### Income tax: The Port Robe Estate Vineyard Project

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#### **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**, **Previous Ruling**, **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 1999/95 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**

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1. This Product Ruling is withdrawn and ceases to have effect after 30 June 2003. 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.

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#### **Commissioner of Taxation**

27 September 2000

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#### *Previous draft:*

Not previously issued in draft form

#### *Related Rulings/Determinations:*

TR 92/1; TR 92/20; TD 93/34;  
TR 97/11; TR 97/16; TR 98/22;  
PR 1999/95

#### *Subject references:*

- carrying on a business
- commencement of business
- fee expenses
- interest expenses
- management fees expenses
- primary production
- primary production expenses

- producing assessable income
- product rulings
- public rulings
- schemes and shams
- taxation administration
- tax avoidance
- tax benefits under tax avoidance schemes
- tax shelters
- tax shelters project

#### *Legislative references:*

- ITAA 1936 44(1)
- ITAA 1936 82KZM
- ITAA 1936 82KZME
- ITAA 1936 82KZMF

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|-------------------------|--------------------------|
| - ITAA 1936 82KH(1)     | - ITAA 1997 35-55        |
| - ITAA 1936 82KH(1F)(b) | - ITAA 1997 35-55(1)     |
| - ITAA 1936 82KJ        | - ITAA 1997 35-55(1)(a)  |
| - ITAA 1936 82KK        | - ITAA 1997 35-55(1)(b)  |
| - ITAA 1936 82KL        | - ITAA 1997 42-15        |
| - ITAA 1936 82KL(1)     | - ITAA 1997 42-118       |
| - ITAA 1936 82KZL       | - ITAA 1997 Subdiv 42-C  |
| - ITAA 1936 82KZL(1)    | - ITAA 1997 42-125       |
| - ITAA 1936 82KZM       | - ITAA 1997 42-160       |
| - ITAA 1936 82KZM(1)(c) | - ITAA 1997 42-160(1)    |
| - ITAA 1936 82KZMA      | - ITAA 1997 42-160(3)    |
| - ITAA 1936 82KZMB      | - ITAA 1997 42-165       |
| - ITAA 1936 82KZMB(3)   | - ITAA 1997 42-165(1)    |
| - ITAA 1936 82KZMB(5)   | - ITAA 1997 42-165(2A)   |
| - ITAA 1936 82KZMC      | - ITAA 1997 42-460       |
| - ITAA 1936 82KZMC(4)   | - ITAA 1997 42-460(1)    |
| - ITAA 1936 82KZMD      | - ITAA 1997 42-345       |
| - ITAA 1936 82KZME      | - ITAA 1997 43-10        |
| - ITAA 1936 82KZME(9)   | - ITAA 1997 45-455       |
| - ITAA 1936 82KZME(10)  | - ITAA 1997 45-455(1)    |
| - ITAA 1936 82KZME(11)  | - ITAA 1997 45-455(3)(b) |
| - ITAA 1936 82KZMF      | - ITAA 1997 110-25       |
| - ITAA 1936 Pt IVA      | - ITAA 1997 110-25(2)    |
| - ITAA 1936 177A        | - ITAA 1997 110-25(4)    |
| - ITAA 1936 177C        | - ITAA 1997 110-125      |
| - ITAA 1936 177D        | - ITAA 1997 Subdiv 387-B |
| - ITAA 1997 6-5         | - ITAA 1997 387-125      |
| - ITAA 1997 8-1         | - ITAA 1997 387-130      |
| - ITAA 1997 8-1(1)(a)   | - ITAA 1997 387-150      |
| - ITAA 1997 8-1(1)(b)   | - ITAA 1997 Subdiv 387-D |
| - ITAA 1997 17-5        | - ITAA 1997 387-305      |
| - ITAA 1997 Div 27      | - ITAA 1997 387-305(2)   |
| - ITAA 1997 35-10       | - ITAA 1997 387-310      |
| - ITAA 1997 35-10(2)    | - ITAA 1997 388-55       |
| - ITAA 1997 35-10(3)    | - ITAA 1997 Subdiv 960-Q |
| - ITAA 1997 35-10(4)    | - ITAA 1997 960-335      |
| - ITAA 1997 35-30       | - ITAA 1997 960-340      |
| - ITAA 1997 35-35       | - ITAA 1997 960-345      |
| - ITAA 1997 35-40       | - ITAA 1997 960-350      |
| - ITAA 1997 35-45       | - ITAA 1997 995-1(1)     |

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## ATO references:

NO 99/4544-0

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FOI number: I 1022516

ISSN: 1441-1172