



PR 2001/86W - Income tax: Deductibility of interest incurred on borrowings under The Macquarie Apollo Trust

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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: Deductibility of interest incurred on borrowings under The Macquarie Apollo Trust

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 Rulings**, **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

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 This Product Ruling is withdrawn and ceases to have effect after 30 June 2003.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

Commissioner of Taxation

13 June 2001

Previous draft:

Not previously issued in draft form

Related Rulings/Determinations

TR 95/33

Subject references:

- interest income
- interest expense
- financial products
- prepaid expenses
- product rulings
- public rulings
- taxation administration

Legislative references:

- ITAA 1997 8-1
- ITAA 1997 960-335
- ITAA 1997 960-350
- ITAA 1936 82KL
- ITAA 1936 82KZL

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FOI status: **may be released**

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|-------------------------|--------------------------|
| - ITAA 1936 82KZL(2)(a) | - ITAA 1936 82KZME(3)(b) |
| - ITAA 1936 82KZM | - ITAA 1936 82KZME(5) |
| - ITAA 1936 82KZMA | - ITAA 1936 82KZMF |
| - ITAA 1936 82KZMB | - ITAA 1936 95 |
| - ITAA 1936 82KZMC | - ITAA 1936 97 |
| - ITAA 1936 82KZME | - ITAA 1936 Part IVA |
| - ITAA 1936 82KZME(3) | |
-

ATO references:

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