TD 94/53W - Income tax: what is an appropriate treatment for funds that have been raised under an infrastructure borrowing, but which are not immediately used?

This document has changed over time. This is a consolidated version of the ruling which was published on *7 December 2016*

Australian Government
Australian Taxation Office

Taxation Determination
TD 94/53

Notice of Withdrawal

Taxation Determination

Income tax: what is an appropriate treatment for funds that have been raised under an infrastructure borrowing, but which are not immediately used?

Taxation Determination TD 94/53 is withdrawn with effect from today.

1. TD 94/53 explains what the appropriate treatment of funds that might be raised to be utilised for infrastructure facilities before expenditure is contractually required to be made for the construction or acquisitions of the facilities, where funds are not immediately used.

2. TD 94/53 deals with the former infrastructure borrowing provisions in Division 16L of Part III of the ITAA 1936, which were repealed by the *Taxation Laws Amendment (Infrastructure Borrowings) Act 1997*.

3. TD 94/53 has no ongoing relevance and is therefore withdrawn without replacement.

Commissioner of Taxation
7 December 2016

ATO references

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