TR 2003/1W - Income tax: thin capitalisation - applying the arm's length debt test

This cover sheet is provided for information only. It does not form part of *TR 2003/1W - Income tax: thin capitalisation - applying the arm's length debt test*

This document has changed over time. This is a consolidated version of the ruling which was published on *5 March 2003*

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Notice of Withdrawal

Taxation Ruling

Income tax: thin capitalisation – applying the arm's length debt test

Taxation Ruling TR 2003/1 is withdrawn with effect from today.

1. This Ruling deals with the application of the arm's length debt test contained in the thin capitalisation rules in Division 820 of the *Income Tax Assessment Act 1997*.

2. This Ruling has been withdrawn as it has been updated to provide interpretative guidance on key technical issues that may arise in determining an entity's arm's length debt amount and interpretative guidance relating to the record-keeping requirements in section 820-980 of the *Income Tax Assessment Act 1997.*

3. It is replaced by Taxation Ruling TR 2020/4 *Income tax: thin capitalisation – the arm's length debt test,* published on 12 August 2020. To the extent that the views contained in TR 2003/1 still apply, they have been incorporated into TR 2020/4.

Commissioner of Taxation
12 August 2020

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