TR 94/7W - Income tax: tax shortfall penalties: guidelines for the exercise of the Commissioner's discretion to remit penalty otherwise attracted

This document has changed over time. This is a consolidated version of the ruling which was published on *15 July 2026*

Notice of Withdrawal

Taxation Ruling

Income tax: tax shortfall penalties: guidelines for the exercise of the Commissioner's discretion to remit penalty otherwise attracted

Taxation Ruling TR 94/7 is withdrawn with effect from 16 July 2026.

1. This Ruling set out how the discretion contained in former subsection 227(3) of the *Income Tax Assessment Act 1936* may be exercised to remit penalties otherwise payable under former sections 226G, 226H, 226J, 226K, 226L and 226M of that Act. It applies to the 1992–93 income year and substituted accounting periods.

2. We are withdrawing this Ruling because the provisions have been repealed with effect from 14 September 2009.

3. Similar penalty provisions are now found in Subdivision 284-B of Schedule 1 to the the *Taxation Administration Act 1953*.

Commissioner of Taxation
15 July 2026

ATO references

NO:	1-1AIP2GYT
ISSN:	2205-6122