

TD 60 - Capital Gains: Can the value of a taxpayer's labour be included in the cost base of an asset constructed or created by the taxpayer?

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 This ruling contains references to repealed provisions, some of which may have been rewritten. The ruling still has effect. Paragraph 32 in [TR 2006/10](#) provides further guidance on the status and binding effect of public rulings where the law has been repealed or repealed and rewritten. The legislative references at the end of the ruling indicate the repealed provisions and, where applicable, the rewritten provisions.

 This document has changed over time. This is a consolidated version of the ruling which was published on *29 November 2006*

CGT Cell Determinations do not have the force of law, but can be relied upon as being the considered view of the ATO. Unless otherwise stated, the view expressed may be applied to transactions entered into both before and after the date of issue of the Determination.

CGT Determination Number 60

Capital Gains: Can the value of a taxpayer's labour be included in the cost base of an asset constructed or created by the taxpayer?

Determination

1. No. Where an asset is constructed or created by the taxpayer, no value can be attributed to that labour for inclusion in the cost base of the asset.

COMMISSIONER OF TAXATION

21 May 1992

FOI INDEX DETAIL: Reference No. CGT 60

Subject Ref: Value of own labour

Legislative Ref: 160ZH

ATO Ref: CGT Cell

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