

TR 94/D36W - Notice of Withdrawal - Income tax: captive insurance companies - deductibility of premiums and the appropriate basis of assessment

 This cover sheet is provided for information only. It does not form part of *TR 94/D36W - Notice of Withdrawal - Income tax: captive insurance companies - deductibility of premiums and the appropriate basis of assessment*



Notice of Withdrawal

Income tax: captive insurance companies -
deductibility of premiums and the appropriate basis
of assessment

Draft Taxation Ruling TR 94/D36 is withdrawn with effect from
today.

The Ruling has been withdrawn because its reasoning is contrary to
the decision in *WD & HO Wills (Australia) Pty Ltd v. FC of T*
96 ATC 4223; 22ATR 168. The Commissioner though reserves the
right to test judicially any captive insurance company case which
exhibits blatant or objectionable features.

Commissioner of Taxation

19 January 2000

ATO references:

NO 99/15852-2

BO

ISSN: 1039 - 0731