## PR 2001/1W - Income tax: The Paulownia West Coast Project No. 4

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Australian Taxation Office

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## **Product Ruling**

Income tax: The Paulownia West Coast Project No. 4

## Preamble

The number, subject heading, and the What this Product Ruling is about (including Tax law(s), Class of persons and Qualifications sections), Date of effect, Withdrawal, Arrangement and Ruling parts of this document are a 'public ruling' in terms of Part IVAAA of the Taxation Administration Act 1953. Product Ruling PR 1999/95 explains Product Rulings and Taxation Rulings TR 92/1 and TR 97/16 together explain when a Ruling is a public ruling and how it is binding on the Commissioner.

## Withdrawal

1. This Product Ruling is withdrawn and ceases to have effect after 30 June 2003. The Ruling continues to apply, in respect of the tax law(s) ruled upon, to all persons within the specified class who enter into the specified arrangement during the term of the Ruling. Thus, the Ruling continues to apply to those persons, even following its withdrawal, who entered into the specified arrangement prior to withdrawal of the Ruling. This is subject to there being no change in the arrangement or in the persons' involvement in the arrangement.

| <b>Commissioner of Taxation</b><br>10 January 2001  |  |
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| <i>Previous draft:</i><br>Not previously issued in draft form   | <ul><li> taxation administration</li><li> tax avoidance</li></ul>  |
| <i>Related Rulings/Determinations:</i><br>PR 1999/95; TR 92/1; TR 92/20;<br>TR 97/11; TR 97/16; TD 93/34;<br>TR 98/22   | <ul> <li>tax benefits under tax avoidance<br/>schemes</li> <li>tax shelters</li> <li>tax shelters project</li> </ul>   |
| Subject references:<br>- carrying on a business<br>- commencement of business<br>- fee expenses<br>- interest expenses<br>- management fees<br>- producing assessable income<br>- product rulings<br>- public rulings | Legislative references:<br>- ITAA 1936 82KL<br>- ITAA 1936 82KZL<br>- ITAA 1936 82KZL(1)<br>- ITAA 1936 82KZM<br>- ITAA 1936 82KZM(1)<br>- ITAA 1936 82KZMA<br>- ITAA 1936 82KZMA(4)<br>- ITAA 1936 82KZMB<br>- ITAA 1936 82KZMB |

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|   | ITAA 1936 | 82KZMD    | - | ITAA 1997 | 35-10(2)     |
|---|-----------|-----------|---|-----------|--------------|
| - | ITAA 1936 | 82KZMD(2) | - | ITAA 1997 | 35-10(3)     |
|   | ITAA 1936 | 82KZME    | - | ITAA 1997 | 35-10(4)     |
| - | ITAA 1936 | 82KZME(4) | - | ITAA 1997 | 35-30        |
|   | ITAA 1936 | 82KZME(7) | - | ITAA 1997 | 35-35        |
|   | ITAA 1936 | 82KZMF    | - | ITAA 1997 | 35-40        |
| - | ITAA 1936 | 82KZMF(1) | - | ITAA 1997 | 35-45        |
| - | ITAA 1936 | Pt IVA    | - | ITAA 1997 | 35-55        |
| - | ITAA 1936 | 177A      | - | ITAA 1997 | 35-55(1)     |
| - | ITAA 1936 | 177C      | - | ITAA 1997 | 35-55(1)(a)  |
|   | ITAA 1936 | 177D      | - | ITAA 1997 | 35-55(1)(b)  |
|   | ITAA 1997 | 6-5       | - | ITAA 1997 | Subdiv 960-Q |
|   | ITAA 1997 | 8-1       | - | ITAA 1997 | 960-335      |
|   | ITAA 1997 | 8-1(1)(a) | - | ITAA 1997 | 960-340      |
|   | ITAA 1997 | 17-5      | - | ITAA 1997 | 960-345      |
|   | ITAA 1997 | Div 27    | - | ITAA 1997 | 960-350      |
| - | ITAA 1997 | 27-5      |   |           |              |
| - | ITAA 1997 | Div 35    |   |           |              |
| - | ITAA 1997 | 35-10     |   |           |              |

ATO references: NO 2000/015115 BO FOI number: I 1022046 ISSN: 1441-1172 Product Ruling **PR 2001/1** 

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