## PR 2001/49W - Income tax: Guilderton Olives

Uncome tax: Guilderton Olives

UThis document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2004* 



Australian Taxation Office Product Ruling **PR 2001/49** 

FOI status: may be released

**Product Ruling** Income tax: Guilderton Olives

#### 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 This Product Ruling is withdrawn and ceases to have effect after 30 June 2004. 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.

#### **Commissioner of Taxation** 26 April 2001 Previous draft: tax benefits under tax avoidance Not previously issued in draft form schemes tax shelters Related Rulings/Determinations: tax shelters project PR 1999/95; TR 92/1; TR 92/20; TR 97/11; TR 97/16; TD 93/34; *Legislative references:* TR 98/22; IT 2001 ITAA 1936 82KL ITAA 1936 82KL(1) Subject references: ITAA 1936 82KH(1) carrying on a business ITAA 1936 82KH(1F)(b) commencement of business ITAA 1936 82KZL fee expenses - ITAA 1936 82KZL(1) interest expenses - ITAA 1936 82KZM management fees - ITAA 1936 82KZM(1) producing assessable income - ITAA 1936 82KZMA product rulings - ITAA 1936 82KZMA(4) public rulings - ITAA 1936 82KZMB taxation administration - ITAA 1936 82KZMC tax avoidance ITAA 1936 82KZMD

Page 1 of 2

# Product Ruling **PR 2001/49**

FOI status: may be released

Pa	ge	2	of	2

-	ITAA 1936	82KZMD(2)
-	ITAA 1936	
-	ITAA 1936	
-		82KZME(7)
-	ITAA 1936	
-	ITAA 1936	82KZMF(1)
-	ITAA 1936	
	ITAA 1936	
	ITAA 1936	
	ITAA 1936	
-		
-	ITAA 1997	Part 2-25
-	ITAA 1997	6-5
-	ITAA 1997	8-1
-	ITAA 1997	8-1(1)(a)
	ITAA 1997	
-	ITAA 1997	Div 27
-	ITAA 1997	27-5
	ITAA 1997	Div 35
-	ITAA 1997	35-10
-	ITAA 1997	35-10(2)
-	ITAA 1997	35-10(3)
-	ITAA 1997	35-10(4)
-	ITAA 1997	
-	ITAA 1997	35-35
-	ITAA 1997	35-40

ITAA 1997 35-45 \_ ITAA 1997 35-55 \_ ITAA 1997 35-55(1) --ITAA 1997 35-55(1)(a) \_ ITAA 1997 35-55(1)(b) ITAA 1997 387-125 -ITAA 1997 388-55 -ITAA 1997 Subdiv 960-Q \_ ITAA 1997 960-335 \_ ITAA 1997 960-340 \_ ITAA 1997 960-345 \_ ITAA 1997 960-350 \_ Corporations Law 708 \_ Corporations Law 708(1) -Corporations Law 708(2) \_ Corporations Law 708(3) -Corporations Law 708(4) -Corporations Law 708(5) Corporations Law 708(6) Corporations Law 708(7) \_ Corporations Law 708(8) \_ Corporations Law 708(9) \_ Corporations Law 708(10) -Corporations Law 708(11) \_

ATO references: NO BO FOI number: I 1024772 ISSN: 1441-1172