# PR 2002/49W - Income tax: ITC Sandalwood Project 2002

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This document has changed over time. This is a consolidated version of the ruling which was published on 1 July 2005

FOI status: may be released

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### **Product Ruling**

Income tax: ITC Sandalwood Project 2002

### 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 This Product Ruling is withdrawn and ceases to have effect after 30 June 2005. 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 24 April 2002

Previous draft:

Not previously issued in draft form

Related Rulings/Determinations: PR 1999/95; TR 92/1; TR 92/20; TR 97/11; TR 97/16; TR 98/22; TR 2000/8; TD 93/34; IT 360

### Subject references:

- carrying on a business
- commencement of business
- fee expenses
- interest expenses
- management fees
- producing assessable income
- product rulings
- public rulings
- taxation administration
- tax avoidance

- tax benefits under tax avoidance schemes
- tax shelters
- tax shelters project

### Legislative references:

- ITAA 1936 82KL
- ITAA 1936 82KZL
- ITAA 1936 82KZL(1)
- ITAA 1936 82KZME
- ITAA 1936 82KZME(2)
- ITAA 1936 82KZME(3)
- ITAA 1936 82KZME(4)
- ITAA 1936 82KZME(4)
- ITAA 1936 82KZMF
- ITAA 1936 82KZMF(1)
- ITAA 1936 82KZMG(1)
- ITAA 1936 82KZMG(2)
- ITAA 1936 82KZMG(3)

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_	ITAA 1936	82KZMG(4)	_	ITAA 1997 35-45
_	ITAA 1936	82KZMG(5)	_	ITAA 1997 35-55
_	ITAA 1936	Pt IVA	_	ITAA 1997 35-55(1)
_	ITAA 1936	177A	_	ITAA 1997 35-55(1)(a)
_	ITAA 1936	177C	_	ITAA 1997 35-55(1)(b)
_	ITAA 1936	177D	_	ITAA 1997 Div 328
_	ITAA 1936	177D(b)	_	ITAA 1997 328-105
_	ITAA 1997	6-5	_	ITAA 1997 328-105(1)(a)
_	ITAA 1997	8-1	_	ITAA 1997 Subdiv 328-F
_	ITAA 1997	17-5	_	ITAA 1997 Subdiv 328-G
_	ITAA 1997	Div 27	_	Copyright Act 1968
_	ITAA 1997	Div 35	_	TAA 1953 Pt IVAAA
_	ITAA 1997	35-10		
_	ITAA 1997	35-10(2)		
_	ITAA 1997	35-10(3)	Ca	use references:
_	ITAA 1997	35-10(4)	_	FCT v. Lau 84 ATC 4929
_	ITAA 1997	35-30		
_	ITAA 1997	35-35		
_	ITAA 1997	35-40		
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ATO references:
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