



# ***PR 2003/8W - Income tax: Tanunda Hill Vineyard Project Stage II***

 This cover sheet is provided for information only. It does not form part of *PR 2003/8W - Income tax: Tanunda Hill Vineyard Project Stage II*

 This document has changed over time. This is a consolidated version of the ruling which was published on *4 August 2004*



# Notice of Withdrawal

---

## Product Ruling

### Income tax: Tanunda Hill Vineyard Project Stage II

Product Ruling PR 2003/8 is withdrawn with effect from today.

1. Product Ruling PR 2003/8 sets out the Commissioner's opinion on the tax consequences for persons participating in the Tanunda Hill Vineyard Project Stage II ('the Project') by entering into an allotment and management agreement for the purpose of carrying on a commercial viticulture project.

2. We have reviewed the Project and determined that the arrangement, as implemented, is materially different from that described in the Ruling for the following reasons:

- the vineyard establishment work was carried out prior to any Growers being accepted into the project; and
- this has a direct effect on the availability and/or quantum of deductions for all Growers.

3. As a result, Product Ruling PR 2003/8 has no application as it does not rule on the tax consequences for any taxpayer.

4. Growers who were accepted to participate in the Project cannot rely on PR 2003/8. However, such Growers may wish to lodge private ruling requests that will enable the tax consequences to be determined in relation to an individual's particular circumstances.

---

**Commissioner of Taxation**

4 August 2004

---

ATO references

NO: 2003/11684

ISSN: 1441-1172