



# ***PR 2004/104W - Income tax: Palandri Wine Project***

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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*



## Product Ruling

### Income tax: Palandri Wine Project

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#### **Preamble**

*The number, subject heading, **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

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1. This Product Ruling is withdrawn and ceases to have effect after 30 June 2005. Even following its withdrawal, this Ruling continues to apply, in respect of the tax laws ruled upon, to all persons within the specified class who entered into the Project during the period 29 November 2000 to 31 December 2000 and entered into the specified arrangement that is set out in paragraphs 14 to 42 of PR 2000/114. This is subject to there being no material difference in the arrangement or in the persons' involvement in the arrangement.

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#### **Commissioner of Taxation**

10 November 2004

#### *Previous draft:*

Not previously released in draft form

#### *Related Rulings/Determinations:*

PR 1999/95; PR 2000/114;  
TR 92/1; TR 92/20; TR 97/16;  
TR 2001/14; TD 93/34

#### *Subject references:*

- commissioner's discretion
- non commercial loss

- product rulings

#### *Legislative references:*

- ITAA 1997 Div 35
- ITAA 1997 35-10
- ITAA 1997 35-10(2)
- ITAA 1997 35-55
- ITAA 1997 35-55(1)(b)
- TAA 1953 Pt IVAAA
- Copyright Act 1968

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#### ATO references

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