


PR 2005/104W - Income tax: tax consequences of investing in Greenway Notes

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 This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2008*



Product Ruling

Income tax: tax consequences of investing in Greenway Notes

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

1. This Product Ruling is withdrawn and ceases to have effect after 30 June 2008. 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 arrangement specified below. 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

10 August 2005

Previous draft:

Not previously issued as a draft

Related Rulings/Determinations:

PR 1999/95; TR 92/1; TR 92/20;
TR 96/14; TR 97/16; TD 93/34

Subject references:

- deferred interest securities
- eligible return
- issue price
- product rulings
- public rulings
- qualifying security
- securities
- traditional securities

Legislative references:

- TAA 1953 Pt IVAAA
- ITAA 1936 26BB
- ITAA 1936 26BB(1)
- ITAA 1936 70B
- ITAA 1936 97
- ITAA 1936 Pt III Div 16E
- ITAA 1936 159GP
- ITAA 1936 159GP(1)
- ITAA 1936 159GP(3)
- ITAA 1936 159GQ
- ITAA 1936 318
- ITAA 1997 6-5
- ITAA 1997 6-5(1)
- ITAA 1997 995-1
- Copyright Act 1968

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FOI status: **may be released**

ATO references

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