

# ***PR 2005/32W - Income tax: Rewards Group Tropical Fruits Project 6***

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 This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2007*



## Product Ruling

### Income tax: Rewards Group Tropical Fruits Project 6

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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 IVA 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 This Product Ruling is withdrawn and ceases to have effect after 30 June 2007. 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 person's involvement in the arrangement.

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#### **Commissioner of Taxation**

16 March 2005

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#### *Previous draft:*

Not previously issued as a draft

#### *Related Rulings/Determinations:*

PR 1999/95; TR 92/1; TR 92/20;  
TR 97/11; TR 97/16; TR 98/22;  
TR 2000/8; TR 2001/14; TD 93/34

#### *Subject references:*

- carrying on a business
- commencement of business
- management fee expenses
- non-commercial loss
- primary production
- primary production expenses
- producing assessable income
- product rulings
- public rulings
- schemes and shams
- tax avoidance

- tax benefits under tax avoidance schemes

- tax shelters

- taxation administration

#### *Legislative references:*

- TAA 1953 Pt IVA
- ITAA 1997 6-5
- ITAA 1997 8-1
- ITAA 1997 17-5
- ITAA 1997 Div 27
- ITAA 1997 Div 35
- ITAA 1997 35-10
- ITAA 1997 35-10(2)
- ITAA 1997 35-55
- ITAA 1997 35-55(1)(b)
- ITAA 1997 Div 40
- ITAA 1997 Subdiv 40-F
- ITAA 1997 40-515
- ITAA 1997 40-515(1)(a)

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|-----------------------------------|--------------------------------|
| - ITAA 1997 40-515(1)(b)          | - ITAA 1936 82KZMB             |
| - ITAA 1997 40-520(1)             | - ITAA 1936 82KZMC             |
| - ITAA 1997 40-525(2)             | - ITAA 1936 82KZMD             |
| - ITAA 1997 40-530                | - ITAA 1936 82KZME             |
| - ITAA 1997 40-535                | - ITAA 1936 82KZME(7)          |
| - ITAA 1997 40-540                | - ITAA 1936 82KZMF             |
| - ITAA 1997 40-545                | - ITAA 1936 Pt IVA             |
| - ITAA 1997 Div 328               | - ITAA 1936 177A               |
| - ITAA 1997 328-105               | - ITAA 1936 177C               |
| - ITAA 1997 328-105(1)(a)         | - ITAA 1936 177D               |
| - ITAA 1997 328-105(1)(b)         | - ITAA 1936 177D(b)            |
| - ITAA 1997 Subdiv 328-F          | - Copyright Act 1968           |
| - ITAA 1997 Subdiv 328-G          | - Corporations Act 2001        |
| - ITAA 1936 82KL                  |                                |
| - ITAA 1936 Pt III Div 3 Subdiv H | <i>Case references:</i>        |
| - ITAA 1936 82KZL                 | - FCT v. Lau (1984) 6 FCR 202; |
| - ITAA 1936 82KZL(1)              | 84 ATC 4929, (1984) 16 ATR 932 |
| - ITAA 1936 82KZM                 |                                |
| - ITAA 1936 82KZMA                |                                |
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ATO references:

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