## PR 2005/37W - Income tax: Macquarie Forestry Investment 2005 (Post 30 June 2005 Growers)

Uncome tax: Macquarie Forestry Investment 2005 (Post 30 June 2005 Growers)

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

Australian Government



Australian Taxation Office

FOI status: may be released

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Product Ruling

PR 2005/3

#### **Product Ruling**

Income tax: Macquarie Forestry Investment 2005 (Post 30 June 2005 Growers)

#### 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 This Product Ruling is withdrawn and ceases to have effect after 30 June 2008.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** 23 March 2005

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; TD 2003/12

Subject references:

- advance deductions and expenses for certain forestry expenditure
- carrying on a business
- commencement of business
- fee expenses
- forestry agreement
- interest expenses

- management fees
- non-commercial losses
- producing assessable income
- product rulings
- public rulings
- seasonally dependent agronomic activity
- tax avoidance
- tax benefits under tax avoidance schemes
- tax shelters
- tax shelters project
- taxation administration

#### Legislative references:

- ITAA 1936 82KL
- ITAA 1936 Part III Div 3 Subdiv H
- ITAA 1936 82KZL
- ITAA 1936 82KZL(1)
- ITAA 1936 82KZM

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- ITAA 1936	82KZMA
- ITAA 1936	82KZMB
- ITAA 1936	82KZMC
- ITAA 1936	82KZMD
- ITAA 1936	82KZME
- ITAA 1936	82KZME(1)
- ITAA 1936	82KZME(2)
- ITAA 1936	82KZME(3)
- ITAA 1936	82KZME(4)
- ITAA 1936	82KZME(7)
- ITAA 1936	82KZMF
- ITAA 1936	82KZMF(1)
- ITAA 1936	82KZMG
- ITAA 1936	82KZMG(1)
- ITAA 1936	82KZMG(2)
- ITAA 1936	82KZMG(3)
- ITAA 1936	82KZMG(4)
- ITAA 1936	82KZMG(5)
- ITAA 1936	Pt IVA
- ITAA 1936	177A
- ITAA 1936	177C
- ITAA 1936	177D
- ITAA 1936	177D(b)
- ITAA 1997	6-5
- ITAA 1997	8-1
- ITAA 1997	17-5

- ITAA 1997 25-25 - 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 Pt 3-1 - ITAA 1997 108-5 - ITAA 1997 110-25(2) - ITAA 1997 Div 328 - ITAA 1997 328-105 - ITAA 1997 328-105(1)(a) - ITAA 1997 Subdiv 328-F - ITAA 1997 Subdiv 328-G - TAA 1953 Pt IVAAA - Copyright Act 1968 - Corporations Act 2001 Case references: - Commissioner of Taxation v. Lau (1984) 6 FCR 202; 84 ATC 4929;

(1984) 16 ATR 55

ATO references:

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