# PR 2006/19W - Income tax: Primary Yield Eucalypt Project No. 9 - Post 30 June Growers (to 31 December 2006)

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This document has changed over time. This is a consolidated version of the ruling which was published on 1 July 2009

Page status: **binding** Page 1 of 2

### **Product Ruling**

Income tax: Primary Yield Eucalypt Project No. 9 – Post 30 June Growers (to 31 December 2006)

#### • This Ruling provides you with the following level of protection:

This publication (excluding appendices) is a public ruling for the purposes of the *Taxation Administration Act 1953*.

A public ruling is an expression of the Commissioner's opinion about the way in which a taxation provision applies, or would apply, to entities generally or to a class of entities in relation to a particular scheme or a class of schemes. If you rely on this ruling, we must apply the law to you in the way set out in the ruling (or in a way that is more favourable for you if we are satisfied that the ruling is incorrect and disadvantages you, and we are not prevented from doing so by a time limit imposed by the law). You will be protected from having to pay any under-paid tax, penalty or interest in respect of the matters covered by this ruling if it turns out that it does not correctly state how the relevant provision applies to you.

#### Withdrawal

1. This Product Ruling is withdrawn and ceases to have effect after 30 June 2009. The Ruling continues to apply, in respect of the tax law(s) ruled upon, to all entities within the specified class who enter into the scheme specified below. Thus, the Ruling continues to apply to those entities, even following its withdrawal, who entered into the specified scheme prior to withdrawal of the Ruling. This is subject to there being no change in the scheme or in the entities' involvement in the scheme.

**Commissioner of Taxation** 

22 March 2006

## PR 2006/19

Page 2 of 2 Page status: non binding

### References

Previous draft. - ITAA 1936 82KZMA - ITAA 1936 82KZMB Not previously issued as a draft - ITAA 1936 82KZMC

- ITAA 1936 82KZMD Related Rulings/Determinations: - ITAA 1936 82KZME TR 92/20; TR 97/11; TR 98/22; - ITAA 1936 82KZMF TR 2000/8; TR 2001/14; - ITAA 1936 82KZMG TR 2002/6; TR 2002/11; - ITAA 1936 Pt IVA TD 93/34; TD 2003/12 - ITAA 1936 177A

- ITAA 1936 177C

- Corporations Act 2001

Case references:

Subject references:

- ITAA 1936 177D - advance deductions and - ITAA 1936 177D(b) expenses for certain forestry

- ITAA 1997 6-5 expenditure - ITAA 1997 8-1 - carrying on a business - ITAA 1997 17-5 - commencement of business - ITAA 1997 25-25 - fee expenses - ITAA 1997 Div 27 - forestry agreement - ITAA 1997 Div 35

- interest expenses - ITAA 1997 35-10 - management fees - ITAA 1997 35-10(2) - non-commercial losses - ITAA 1997 35-55

- producing assessable income - ITAA 1997 35-55(1)(b) - product rulings - ITAA 1997 Subdiv 61-J - public rulings - ITAA 1997 Div 328

- seasonally dependent - ITAA 1997 Subdiv 328-F agronomic activity - ITAA 1997 Subdiv 328-G - tax avoidance - IT(TP)A 1997 Div 328

- tax benefits under tax avoidance - IT(TP)A 1997 328-120 schemes - IT(TP)A 1997 328-125

- tax shelters - TAA 1953 - tax shelters project - Copyright Act 1968 - taxation administration

Legislative references:

- ITAA 1936 82KL - Commissioner of Taxation v. Lau

- ITAA 1936 Pt III Div 3 Subdiv H (1984) 6 FCR 202; 84 ATC 4929; - ITAA 1936 82KZL (1984) 16 ATR 55

- ITAA 1936 82KZL(1)

ATO references

- ITAA 1936 82KZM

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