

# ***PR 2006/31W - Income tax: Rewards Group Tropical Fruits Project 2006***

 This cover sheet is provided for information only. It does not form part of *PR 2006/31W - Income tax: Rewards Group Tropical Fruits Project 2006*

 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: Rewards Group Tropical Fruits Project 2006

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**ⓘ This Ruling provides you with the following level of protection:**

This publication (excluding appendixes) 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 relevant 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 underpaid 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

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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 This Product Ruling is withdrawn and ceases to have effect after 30 June 2008.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 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 entity's involvement in the scheme.

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**Commissioner of Taxation**  
29 March 2006

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## References

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<i>Previous draft:</i>	- ITAA 1936 177D
Not previously issued as a draft	- ITAA 1936 177D(b)
	- ITAA 1997 6-5
<i>Related Rulings/Determinations:</i>	- ITAA 1997 8-1
TD 93/34; TR 92/20; TR 97/11;	- ITAA 1997 17-5
TR 98/22; TR 2000/8;	- ITAA 1997 25-25
TR 2001/14	- ITAA 1997 Div 27
	- ITAA 1997 Div 35
<i>Subject references:</i>	- ITAA 1997 35-10
- carrying on a business	- ITAA 1997 35-10(2)
- commencement of business	- ITAA 1997 35-55
- fee expenses	- ITAA 1997 35-55(1)(b)
- horticulture	- ITAA 1997 Div 40
- irrigation expenses	- ITAA 1997 40-25
- management fees expenses	- ITAA 1997 40-70(1)
- non-commercial losses	- ITAA 1997 40-75(1)
- primary production	- ITAA 1997 40-100
- primary production expenses	- ITAA 1997 40-105
- primary production income	- ITAA 1997 40-440
- producing assessable income	- ITAA 1997 40-515
- product rulings	- ITAA 1997 40-515(1)(b)
- public rulings	- ITAA 1997 40-525(2)
- schemes and shams	- ITAA 1997 40-530
- tax administration	- ITAA 1997 40-535
- tax avoidance	- ITAA 1997 40-545
- tax benefits under tax avoidance	- ITAA 1997 40-630
schemes	- ITAA 1997 40-635
- tax shelters	- ITAA 1997 Subdiv 61-J
- tax shelters project	- ITAA 1997 Div 328
	- ITAA 1997 328-105
<i>Legislative references:</i>	- ITAA 1997 Subdiv 328-D
- TAA 1953	- ITAA 1997 328-185
- ITAA 1936 82KL	- ITAA 1997 328-190
- ITAA 1936 Pt III Div 3 Subdiv H	- ITAA 1997 Subdiv 328-F
- ITAA 1936 82KZL	- ITAA 1997 Subdiv 328-G
- ITAA 1936 82KZL(1)	- IT(TP)A 1997 Div 328
- ITAA 1936 82KZM	- IT(TP)A 1997 328-120
- ITAA 1936 82KZMA	- IT(TP)A 1997 328-125
- ITAA 1936 82KZMB	- Copyright Act 1968
- ITAA 1936 82KZMC	- Corporations Act 2001
- ITAA 1936 82KZMD	
- ITAA 1936 82KZME	<i>Case references:</i>
- ITAA 1936 82KZME(7)	- Commissioner of Taxation v. Lau
- ITAA 1936 82KZMF	(1984) 6 FCR 202; 84 ATC 4929;
- ITAA 1936 Pt IVA	(1984) 16 ATR 55
- ITAA 1936 177A	
- ITAA 1936 177C	

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### ATO references

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