

# ***TD 94/27W - Income tax: does 'separate net income' include the imputation credits attached to franked dividends?***

! This cover sheet is provided for information only. It does not form part of *TD 94/27W - Income tax: does 'separate net income' include the imputation credits attached to franked dividends?*

! TD 94/27 has been withdrawn as part of a project to review public rulings.

! This document has changed over time. This is a consolidated version of the ruling which was published on *27 June 2018*



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# Notice of Withdrawal

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## Taxation Determination

Income tax: does 'separate net income' include the imputation credits attached to franked dividends?

Taxation Determination TD 94/27 is withdrawn with effect from today.

1. TD 94/27 concluded that imputation credits are not included in 'separate net income' as defined in section 159J of the *Income Tax Assessment Act 1936*.
2. Section 159J has been replaced with Subdivision 961-A of the *Income Tax Assessment Act 1997*. The concept of 'separate net income' has been replaced with 'adjusted taxable income for offsets'.
3. TD 94/27 has no ongoing relevance, and is withdrawn without replacement.

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**Commissioner of Taxation**  
27 June 2018

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ATO references

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