

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 TD 94/27 has been withdrawn as part of a project to review public rulings.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



Notice of Withdrawal

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Taxation Determination TD 94/27 is withdrawn with effect from today.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 TD 94/27 has no ongoing relevance, and is withdrawn without replacement.

Commissioner of Taxation
27 June 2018

ATO references

NO: 1-D75OWX3
ISSN: 2205-6211

© AUSTRALIAN TAXATION OFFICE FOR THE
COMMONWEALTH OF AUSTRALIA

You are free to copy, adapt, modify, transmit and distribute this material as you wish (but not in any way that suggests the ATO or the Commonwealth endorses you or any of your services or products).