# *TR 2001/List - Income tax and other taxes: Determinations, Rulings, and notices of withdrawal, addendum and erratum issued in 2001*

This cover sheet is provided for information only. It does not form part of *TR 2001/List - Income tax and other taxes: Determinations, Rulings, and notices of withdrawal, addendum and erratum issued in 2001*

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# Taxation Ruling
Income tax and other taxes: Determinations, Rulings, notices of withdrawal, addendum and erratum issued in 2001

Contents Para

**What this Ruling is about** 1
**Ruling** 2
**Goods and Services Tax** 3
**Income tax** 4
**Excise Bulletins** 5
**Product Rulings** 6
**Class Rulings** 7
**Superannuation Contributions** 8
**Superannuation Guarantee** 9
**Taxation Rulings** 10
**Taxation Determinations** 11

***Preamble***

*This document is not a 'public ruling' in terms of Part IVAAA of the* ***Taxation Administration Act 1953*** *and is not legally binding on the Commissioner. 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.*

## What this Ruling is about

### Class of person/arrangement

1. This Ruling lists all draft and final Determinations and Rulings, as well as all notices of withdrawal and addendum to Determinations and Rulings, issued by the Commissioner of Taxation in calendar year 2001.

## Ruling

2. This Ruling lists the documents that have been issued during 2001 divided by function and showing in relation to each action the number of the document, its title and the date the action took place.

## Goods and Services Tax

3. During the calendar year 2001 the Commissioner of Taxation issued:

### Draft Goods and Services Tax Rulings

| Ruling | Title | Issue date |
|---|---|---|
| GSTR 2001/D1 | Goods and services tax: how does section 188-25 affect the calculation of 'projected annual turnover' for the purposes of the GST Act? | 09.05.01 |
| GSTR 2001/D2 | Goods and services tax: when is a 'supply of a going concern' GST-free? | 28.02.01 |

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|---|---|---|
| GSTR 2001/D3 | Goods and services tax: when is a sale of real property a sale of new residential premises? | 20.06.01 |
| GSTR 2001/D4 | Goods and services tax: apportioning the consideration for a supply that includes taxable and non-taxable parts | 29.06.01 |
| GSTR 2001/D5 | Goods and services tax: non-monetary consideration | 29.06.01 |
| GSTR 2001/D6 | Goods and services tax: Exports of goods | 29.08.01 |
| GSTR 2001/D7 | Goods and Services Tax: prizes | 28.11.01 |
| GSTR 2001/D8 | Goods and services tax: recipient created tax invoices and foreign currency conversions | 19.12.01 |
| GSTR 2001/D9 | Goods and services tax: GST treatment of financial supplies and related supplies and acquisitions | 19.12.01 |

## Draft Goods and Services Tax Rulings - notices of Addenda

| Ruling | Title | Issue date |
|---|---|---|
| GSTR 2000/20 | Goods and Services Tax: commercial residential premises | 19.12.01 |

## Goods and Services Tax Rulings

| Ruling | Title | Issue date |
|---|---|---|
| GSTR 2001/1 | Goods and Services Tax: supplies that are GST-free for tertiary education courses | 17.01.01 |
| GSTR 2001/2 | Goods and Services Tax: Foreign Exchange conversion | 02.02.01 |
| GSTR 2001/3 | Goods and Services Tax: GST and how it applies to supplies of fringe benefits | 18.05.01 |
| GSTR 2001/4 | Goods and Services Tax: GST consequences of court orders and out-of-court settlements | 20.06.01 |
| GSTR 2001/5 | Goods and Services Tax: when is a 'supply of a going concern' GST-free | 11.07.01 |
| GSTR 2001/6 | Goods and Services Tax: non-monetary consideration | 28.11.01 |
| GSTR 2001/7 | Goods and services tax: meaning of annual turnover, including the effect of section 188-25 on projected annual turnover | 05.12.01 |
| GSTR 2001/8 | Goods and services tax: apportioning the consideration for a supply that includes taxable and non-taxable parts | 19.12.01 |

## Goods and Services Tax Rulings - notices of Partial Withdrawal

| Ruling | Title | Issue date |
|---|---|---|
| GSTR 2001/5 | Goods and services tax: when is a 'supply of a going concern' GST-free? | 05.09.01 |

### Draft Goods and Services Tax Determinations

| Ruling | Title | Issue date |
|---|---|---|
| GSTD 2001/D1 | Goods and Services Tax: what are the requirements for treating a particular document as an adjustment note when an adjustment arises from a payment made by a third party? | 31.10.01 |

### Goods and Services Tax Determinations

| Ruling | Title | Issue date |
|---|---|---|
| GSTD 2001/1 | Goods and Services Tax: what is the GST treatment of the administration levy paid by parents and carers to a Family Day Care Scheme and Child Care Benefits (CCB) paid to carers by a Family Day Care Scheme on behalf of parents? | 10.01.01 |
| GSTD 2001/2 | Goods and Services Tax: is the sale of goods by a lessor on expiry of a lease agreement a separate supply to the lease of the goods? | 14.03.01 |

### Goods and Services Tax Bulletins

| Ruling | Title | Issue date |
|---|---|---|
| GSTB 2001/1 | Goods and Services Tax: Pulses supplied as food for human consumption | 28.03.01 |
| GSTB 2001/2 | Goods and Services Tax: Accommodation in caravan parks and camping grounds | 16.05.01 |
| GSTB 2001/3 | Goods and Services Tax: Simplified calculation of input tax credits for caravan park operators | 24.08.01 |

### Goods and Services Tax Bulletins – Notices of Withdrawal

| Ruling | Title | Issue date |
|---|---|---|
| GSTB 2000/5 | Goods and Services Tax: Accommodation in caravan parks and camping grounds | 16.05.01 |

# Income Tax

4. During the calendar year 2001 the Commissioner of Taxation issued:

### Income Tax Rulings – notices of Withdrawal

| Ruling | Title | Issue date |
|---|---|---|
| IT 2500 | Policy governing issue of Income Tax Rulings: status of Rulings: advance opinions | 07.02.01 |
| IT 148 | Income tax: deprecitation on road transport vehicles | 25.07.01 |

# Excise Bulletins

5. During the calendar year 2001 the Commissioner of Taxation issued:

### Final Excise Bulletins

| Ruling | Title | Issue date |
|---|---|---|
| EB 2001/1 | Excise: Diesel and alternative fuels grants scheme – fuel used by regrigerated traliers | 11.04.01 |

# Product Rulings

6. During the calendar year 2001 the Commissioner of Taxation issued:

### Product Rulings

| Ruling | Title | Issue date |
|---|---|---|
| PR 2001/1 | Income tax: The Paulownia West Coast Project No. 4 | 10.01.01 |
| PR 2001/2 | Income tax: Australian Grains Fund | 10.01.01 |
| PR 2001/3 | Income tax: Queensland Paulownia Forests Project No. 5. | 10.01.01 |
| PR 2001/4 | Income tax: Australian Blue Gum 2001 | 17.01.01 |
| PR 2001/5 | Income tax: Tanunda Hill Vineyard Project | 17.01.01 |
| PR 2001/6 | Income tax: Frankland River Olive Project - Supplementary Prospectus | 31.01.01 |
| PR 2001/7 | Income tax: Coonalpyn Olives Project No. 2 | 31.01.01 |
| PR 2001/8 | Income tax: Settlement 22 Managed Investment Scheme | 31.01.01 |
| PR 2001/9 | Income tax: Great Southern Planatations 2001 and 2002 Projects | 31.01.01 |
| PR 2001/10 | Income tax: APT Plantation Project No. 11 | 31.01.01 |
| PR 2001/11 | Income tax: Palandri 2000 Project - Second Offering | 07.02.01 |
| PR 2001/12 | Income tax: Summerhill Orchards 2000 (revised arrangement) | 07.02.01 |
| PR 2001/13 | Income tax: Australian Forests Project 2001 | 14.02.01 |
| PR 2001/14 | Income tax: ITC Sandalwood Project 2001 | 14.02.01 |
| PR 2001/15 | Income tax: 2001 Timbercorp Almond Project | 21.02.01 |
| PR 2001/16 | Income tax: Australian Growth-Timber Project No. 4 | 28.02.01 |
| PR 2001/17 | Income tax: Forest Rewards Sandalwood Project 2001 | 07.03.01 |
| PR 2001/18 | Income tax: Pinetec Woodlot Project 2001 | 07.03.01 |

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|---|---|---|
| PR 2001/19 | Income tax: WRF Kangaroo Island Plantations 2002 | 14.03.01 |
| PR 2001/20 | Income tax: Campbells River Project | 14.03.01 |
| PR 2001/21 | Income tax: Willmott Forests - 2001 Project | 21.03.01 |
| PR 2001/22 | Income tax: Larenta Olives Project No. 2 | 21.03.01 |
| PR 2001/23 | Income tax: The Boundary Bend Estate (J.V. Three) Project | 21.03.01 |
| PR 2001/24 | Income tax: Ginkgo Australia Project | 21.03.01 |
| PR 2001/25 | Income tax: The Timber Australia Project | 21.03.01 |
| PR 2001/26 | Income tax: Karri Oak Project No. 2 (Stage 3) | 28.03.01 |
| PR 2001/27 | Income tax: Settlement 22 Managed Investment Scheme | 28.03.01 |
| PR 2001/28 | Income tax: Olea Australia Olive Project Stage II | 28.03.01 |
| PR 2001/29 | Income tax: Tarwoona Olives Scheme No. 1 | 28.03.01 |
| PR 2001/30 | Income tax: Coonawarra Premium Vineyards Project No. 2 | 28.03.01 |
| PR 2001/31 | Income tax: Tasmanian Truffle Project No. 1 | 28.03.01 |
| PR 2001/32 | Income tax: Opal Olive Project | 11.04.01 |
| PR 2001/33 | Income tax: Heydon Park Olive Project | 04.04.01 |
| PR 2001/34 | Income tax: The Schobers Road Vineyard | 04.04.01 |
| PR 2001/35 | Income tax: Braidwood Vineyard Project | 04.04.01 |
| PR 2001/36 | Income tax: Frankland River Olive Project - Supplementary Prospectus | 04.04.01 |
| PR 2001/37 | Income tax: Paulownia Ridge Project | 04.04.01 |
| PR 2001/38 | Income tax: Paulownia Timber Plantations Project | 11.04.01 |
| PR 2001/39 | Income tax: WRF Paulownia Plantations Project | 11.04.01 |
| PR 2001/40 | Income tax: Mount Bellarine Vineyard | 02.05.01 |
| PR 2001/41 | Income tax: Magpie Ridge Vineyards Project | 11.04.01 |
| PR 2001/42 | Income tax: Parkview Orchard Project | 11.04.01 |
| PR 2001/43 | Income tax: Queensland Pine Forests No. 2 | 18.04.01 |
| PR 2001/44 | Income tax: Carina Park Almond Stage 2 Project | 18.04.01 |
| PR 2001/45 | Income tax: Black Truffle Project 2001 | 18.04.01 |
| PR 2001/46 | Income tax: Paulownia Forestry Project 2001 | 18.04.01 |
| PR 2001/47 | Income tax: Barkworth Olives Project No. 5 | 26.04.01 |
| PR 2001/48 | Income tax: Forestry Bond 2001 | 26.04.01 |
| PR 2001/49 | Income tax: Guilderton Olives | 26.04.01 |
| PR 2001/50 | Income tax: The Australian Oak Project | 26.04.01 |
| PR 2001/51 | Income tax: ITC Hardwood Timber Project 2001 | 26.04.01 |
| PR 2001/52 | Income tax: Plantcorp 2001 Radiata Pine Project | 26.04.01 |
| PR 2001/53 | Income tax: Kimseed Eucalyptus Esperance 2000 Project - Supplementary Prospectus April 2001 | 26.04.01 |
| PR 2001/54 | Income tax: Kiri Park Project No. 2 | 02.05.01 |
| PR 2001/55 | Income tax: Forests Rewards Brushwood Project 2001 | 02.05.01 |
| PR 2001/56 | Income tax: Forest Rewards Teak Project 2001 | 02.05.01 |
| PR 2001/57 | Income tax: James Estate Vineyards Project | 09.05.01 |
| PR 2001/58 | Income tax: Sunset Sultana Project | 09.05.01 |
| PR 2001/59 | Income tax: Boort Olives Project No. 1 | 09.05.01 |
| PR 2001/60 | Income tax: APT Eucalypt SolidWood Project 2001 | 09.05.01 |
| PR 2001/61 | Income tax: APT Pine SolidWood Project 2001 | 09.05.01 |
| PR 2001/62 | Income tax: Plantcorp 2001 Blue Gum Projet | 09.05.01 |
| PR 2001/63 | Income tax: Northern Rivers Coffee Project 2 | 09.05.01 |
| PR 2001/64 | Income tax: film investment – The Secret of the Glass of Water | 16.05.01 |

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| PR 2001/65 | Income tax: NoRegrets Managed Retail Franchise Project | 16.05.01 |
| PR 2001/66 | Income tax: Australian Olives Project No. 4 | 16.05.01 |
| PR 2001/67 | Income tax: Settlers Rise Premium Vineyard Project | 23.05.01 |
| PR 2001/68 | Income tax: "Liquid Bridge" Film Investment | 23.05.01 |
| PR 2001/69 | Income tax: Brokkensted Vineyard Project | 23.05.01 |
| PR 2001/70 | Income tax: Australian Growth Timber Project 3 | 30.05.01 |
| PR 2001/71 | Income tax: WRF Kangaroo Island Plantations 2002 | 30.05.01 |
| PR 2001/72 | Income tax: TFS Sandalwood Project 2000 | 30.05.01 |
| PR 2001/73 | Income tax: Brookly Park Olive Groves Project No. 2 | 23.05.01 |
| PR 2001/74 | Income tax: Frankland River Olive Project 2001 | 23.05.01 |
| PR 2001/75 | Income tax: Tumbarumba Paulownia Plantation No. 2 | 23.05.01 |
| PR 2001/76 | Income tax: Carina Park Almond Stage 3 Project | 30.05.01 |
| PR 2001/77 | Income tax: APT Plantation Project No. 11 | 06.06.01 |
| PR 2001/78 | Income tax: Tanunda Hill Vineyard Project | 06.06.01 |
| PR 2001/79 | Income tax: Sandalwood and Mango Project 2001 | 06.06.01 |
| PR 2001/80 | Income tax: deductibility of interest incurred on borrowing's under the ANZ Protected Equity Portfolio Product | 06.06.01 |
| PR 2001/81 | Income tax: Australian Eucalypt Project 1999 | 13.06.01 |
| PR 2001/82 | Income tax: Australian Eucalypt Project 1998 | 13.06.01 |
| PR 2001/83 | Income tax: Beechworth Winegrape Project | 13.06.01 |
| PR 2001/84 | Income tax: Boort Olives Project No. 2 | 13.06.01 |
| PR 2001/85 | Income tax: Brilliant Gold Reef Project | 13.06.01 |
| PR 2001/86 | Income tax: Deductibility of interest incurred on borrowings under The Macquarie Apollo Trust | 13.06.01 |
| PR 2001/87 | Income tax: The Hatchling Film Project | 15.06.01 |
| PR 2001/88 | Income tax: Mount Bellarine Vineyard Project | 15.06.01 |
| PR 2001/89 | Income tax: deductibility of interst incurred on borrowings under the Equity Margins Limited Protected Equity Portfolio Loan | 20.06.01 |
| PR 2001/90 | Income tax: Exotic Timbers of Australia NT3 Project | 20.06.01 |
| PR 2001/91 | Income tax: Mobandilla Cotton Project No. 2 | 20.06.01 |
| PR 2001/92 | Income tax: Grampians Olive Project 2001 | 20.06.01 |
| PR 2001/93 | Income tax: Coonawarra Wine Grape Project | 20.06.01 |
| PR 2001/94 | Income tax: Neem Australia Project No.1 | 27.06.01 |
| PR 2001/95 | Income tax: "The Pact" Film Investment | 27.06.01 |
| PR 2001/96 | Income tax: "Whitman's Vengeance" Film Investment | 27.06.01 |
| PR 2001/97 | Income tax: Australian Eucalypt Project 1997 | 27.06.01 |
| PR 2001/98 | Income tax: Australian Eucalypt Project 1996 | 27.06.01 |
| PR 2001/99 | Income tax: Australian Eucalypt Project 1995 | 27.06.01 |
| PR 2001/100 | Income tax: Australian Eucalypt Project 1994 | 27.06.01 |
| PR 2001/101 | Income tax: Australian Eucalypt Project 1993 | 27.06.01 |
| PR 2001/102 | Income tax: Australian Eucalypt Project 1992 | 27.06.01 |
| PR 2001/103 | Income tax: Old Mundulla Vineyard Project 1998 | 27.06.01 |
| PR 2001/104 | Income tax: Norfolk Ridge Vineyards Prospectus Number 2 | 27.06.01 |
| PR 2001/105 | Income tax: Norfolk Ridge Vineyards | 27.06.01 |
| PR 2001/106 | Income tax: Great Southern Plantations 1994 | 27.06.01 |
| PR 2001/107 | Income tax: Great Southern Plantations 1995 | 27.06.01 |

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| PR 2001/108 | Income tax: Great Southern Plantations 1996 | 27.06.01 |
| PR 2001/109 | Income tax: Great Southern Plantations 1997 | 27.06.01 |
| PR 2001/110 | Income tax: Great Southern Plantations 1998 | 27.06.01 |
| PR 2001/111 | Income tax: Great Southern Plantations 1999 | 27.06.01 |
| PR 2001/112 | Income tax: Great Southern Plantations 2000 | 27.06.01 |
| PR 2001/113 | Income tax: Great Southern Blue Gum Plantations 2000/2001 Projects | 27.06.01 |
| PR 2001/114 | Income tax: Kimseed Robin Downs 1994 Project | 29.06.01 |
| PR 2001/115 | Income tax: Kimseed Robin Downs 1995 Project | 29.06.01 |
| PR 2001/116 | Income tax: Kimseed Robin Downs 1996 Project | 29.06.01 |
| PR 2001/117 | Income tax: Kimseed Robin Downs 1997 Project | 29.06.01 |
| PR 2001/118 | Income tax: Kimseed Eucalypts Esperance 2000 Project | 29.06.01 |
| PR 2001/119 | Income tax: Queensland Paulownia Forests Project No. 4 | 29.06.01 |
| PR 2001/120 | Income tax: Queensland Paulownia Forests Project No. 2 | 29.06.01 |
| PR 2001/121 | Income tax: Paulownia Forestry Scheme | 29.06.01 |
| PR 2001/122 | Income tax: CMCL Produce Pools | 29.06.01 |
| PR 2001/123 | Income tax: 2000 Timbercorp Olive Project (Private Offer) | 04.07.01 |
| PR 2001/124 | Income tax: Tiwi Islands Acacia Project No. 1 | 11.07.01 |
| PR 2001/125 | Income tax: Almond Orchards Australia Robinvale 2000 | 15.08.01 |
| PR 2001/126 | Income tax: Almond Orchards Australia Robinvale 2000 | 15.08.01 |
| PR 2001/127 | Income tax: Forestry Tasmania Trees Trust 1999 | 15.08.01 |
| PR 2001/128 | Income tax: Film Investment – Desert Vet documentaries | 05.09.01 |
| PR 2001/129 | Income tax: Specific Vineyard Project No. 3 | 26.09.01 |
| PR 2001/130 | Income tax: Palandri 2000 Project – Second Offering | 10.10.01 |
| PR 2001/131 | Income tax: ITC Hardwood Timber Project 2000 | 17.10.01 |
| PR 2001/132 | Income tax: ITC Eucalypts 1999 Green Triangle Project | 17.10.01 |
| PR 2001/133 | Income tax: ITC Eucalypts 1999 West Australian Project | 17.10.01 |
| PR 2001/134 | Income tax: 2002 Timbercorp Eucalypts Project | 17.10.01 |
| PR 2001/135 | Income tax: Neem Australia Project No. 1 | 17.10.01 |
| PR 2001/136 | Income tax: Barkworth Olive Groves Project No 3 | 24.10.01 |
| PR 2001/137 | Income tax: Queensland Olives | 24.10.01 |
| PR 2001/138 | Income tax: Australian Olives Project | 24.10.01 |
| PR 2001/139 | Income tax: Australian Olives Project No.2 | 24.10.01 |
| PR 2001/140 | Income tax: Kimseed Robin Downs 1996 Project | 31.10.01 |
| PR 2001/141 | Income tax: Queensland Paulownia Forests Project No 5: Extended Offer | 31.10.01 |
| PR 2001/142 | Income tax: WRF Kangaroo Island Plantations 2002 | 31.10.01 |
| PR 2001/143 | Income tax: Oilgrowers Management Project No 3 | 14.11.01 |
| PR 2001/144 | Income tax: Magpie Ridge Vineyards Project – Stage 1 | 14.11.01 |
| PR 2001/145 | Income tax: Carina Park Almond Project (8 March 2000 to 30 May 2000) | 14.11.01 |
| PR 2001/146 | Income tax: Carina Park Almond Project (1 September 1999 to 7 March 2000) | 14.11.01 |

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| PR 2001/147 | Income tax: Willmott Forests Project - 2002 Prospectus | 14.11.01 |
| PR 2001/148 | Income tax: Australian Blue Gum Project 1999 | 21.11.01 |
| PR 2001/149 | Income tax: Mt Barker Vineyards Fig Tree Lane Vineyard Project | 21.11.01 |
| PR 2001/150 | Income tax: Tasmanian Forests Trust No. 1 | 21.11.01 |
| PR 2001/151 | Income tax: Tasmanian Forests Trust No. 2 | 21.11.01 |
| PR 2001/152 | Income tax: Tasmanian Forests Trust No. 3 | 21.11.01 |
| PR 2001/153 | Income tax: Tasmanian Forests Trust No. 4 | 21.11.01 |
| PR 2001/154 | Income tax: Tasmanian Forests Trust No. 5 | 21.11.01 |
| PR 2001/155 | Income tax: Tasmanian Forests Trust No. 6 | 21.11.01 |
| PR 2001/156 | Income tax: Tasmanian Forest Project 2000 | 21.11.01 |
| PR 2001/157 | Income tax: The Kings Creek Vineyard Project | 28.11.01 |
| PR 2001/158 | Income tax: Willmott Forests – 2000 Project | 28.11.01 |
| PR 2001/159 | Income tax: Timber Capital Plantation Prospectus 1999 | 28.11.01 |
| PR 2001/160 | Income tax: T.F.S. Sandalwood Project No. 2 | 05.12.01 |
| PR 2001/161 | Income tax: Wingrove Paulownia Project | 05.12.01 |
| PR 2001/162 | Income tax: Australian Irrigated Timber Project No 1 (revised arrangement) | 12.12.01 |
| PR 2001/163 | Income tax: deductibility of interest incurred on borrowings under the UBS Warburg Protected Equity Product | 19.12.01 |
| PR 2001/164 | Income tax: Carina Park Almond Stage 4 Project | 19.12.01 |
| PR 2001/165 | Income tax: 1995 Timbercorp Eucalypts Project | 19.12.01 |
| PR 2001/166 | Income tax: 1996 Timbercorp Eucalypts Project | 19.12.01 |
| PR 2001/167 | Income tax: 1997 Timbercorp Eucalypts Project | 19.12.01 |
| PR 2001/168 | Income tax: 1998 Timbercorp Eucalypts Project | 19.12.01 |
| PR 2001/169 | Income tax: Tasmanian Truffle Project No. 1 – Supplementary Prospectus | 19.12.01 |
| PR 2001/170 | Income tax: Lake Aquaculture Project | 19.12.01 |
| PR 2001/171 | Income tax: Mary Valley Paulownia Project | 19.12.01 |
| PR 2001/172 | Income tax: Brookhampton Estate Vineyard Project | 19.12.01 |
| PR 2001/173 | Income tax: Brookhampton Estate Vineyard Project | 19.12.01 |
| PR 2001/174 | Income tax: Coralee Olives Project Stage 1 | 19.12.01 |
| PR 2001/175 | Income tax: Coralee Olives Project Stage 2 | 19.12.01 |
| PR 2001/176 | Income tax: Queensland Paulownia Forests Project No 6 | 19.12.01 |
| PR 2001/177 | Income tax: Margaret River Watershed Premium Wine Project | 19.12.01 |

## Product Rulings – notices of Withdrawal

| Ruling | Title | Issue date |
|---|---|---|
| PR 2000/86 | Income tax: Australian Premium Coffee Project | 31.01.01 |
| PR 1999/46 | Income tax: Pineplan Managed Investment Scheme | 14.02.01 |
| PR 1999/8 | Income tax: Australian Hardwood Management Project No. 2 | 21.02.01 |
| PR 2000/10 | Income tax: Coonawarra Wine-grape Project Investment | 21.02.01 |
| PR 2000/37 | Income tax: Pineplan Managed Investment Scheme | 21.02.01 |
| PR 1999/102 | Income tax: Shaw Vineyard Estate Project 1999 | 21.03.01 |
| PR 2000/44 | Income tax: Parkview Orchard Project | 21.03.01 |

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| PR 1999/103 | Income tax: Tiwi Islands Acacia Project No. 1 | 28.03.01 |
| PR 2000/17 | Income tax: Saint Magnus Vineyards Project | 28.03.01 |
| PR 2000/22 | Income tax: Tiwi Islands Acacia Project No. 2 | 28.03.01 |
| PR 1999/7 | Income tax: Goulburn Valley Orchards Project | 04.04.01 |
| PR 2000/11 | Income tax: Goulburn Valley Orchards 2000 Project | 04.04.01 |
| PR 2000/34 | Income tax: Heydon Park Olive Project | 04.04.01 |
| PR 2000/85 | Income tax: James Estate Vineyard Project | 04.04.01 |
| PR 2001/27 | Income tax: Settlement 22 Managed Investment Scheme | 02.05.01 |
| PR 1999/45 | Income tax: Australian Cotton Project | 09.05.01 |
| PR 1999/61 | Income tax: Coonawarra Premium Vineyard Project | 30.05.01 |
| PR 2000/12 | Income tax: Greenock Vines Project | 30.05.01 |
| PR 2000/64 | Income tax: Carina Park Almond Project | 30.05.01 |
| PR 2000/31 | Income tax: WRF Kangaroo Island Plantations | 06.06.01 |
| PR 1998/5 | Income tax: 1999 Timbercorp Eucalypts Project | 13.06.01 |
| PR 1999/77 | Income tax: Coonawarra Blue Gums 1999 Project | 13.06.01 |
| PR 1999/93 | Income tax: Native Pepper Project | 13.06.01 |
| PR 2000/7 | Income tax: 2000 Timbercorp Euaclypts Project | 13.06.01 |
| PR 2000/41 | Income tax: The Boundary Bend Estate (J.V.Two) Project | 13.06.01 |
| PR 2000/69 | Income tax: Peel River Vineyards | 13.06.01 |
| PR 1999/25 | Income tax: Tasmanian Forest Trust No. 7 Project | 20.06.01 |
| PR 1999/70 | Income tax: Paulownia Tree Farming Project No. 1 | 20.06.01 |
| PR 2000/30 | Income tax: Forest Rewards Sandalwood Project 2000 | 20.06.01 |
| PR 1999/10 | Income tax: The Paulownia West Coast Project No. 2 | 27.06.01 |
| PR 1999/18 | Income tax: Norfolk Ridge Vineyards Project | 27.06.01 |
| PR 1999/24 | Income tax: Murtagh of Rutherglen No 3 | 27.06.01 |
| PR 1999/29 | Income tax: Margaret River Wine Business | 27.06.01 |
| PR 1999/33 | Income tax: Mt Barker Vineyards Fig Tree Lane Vineyard Project | 27.06.01 |
| PR 1999/47 | Income tax: The Koorian Olives Project | 27.06.01 |
| PR 1999/56 | Income tax: Coonalpyn Olives Project | 27.06.01 |
| PR 1999/59 | Income tax: Faraday Riding Vineyard Project | 27.06.01 |
| PR 1999/72 | Income tax: Northern Rivers Coffee Project No 1 | 27.06.01 |
| PR 1999/84 | Income tax: GlenKara Estate Vineyard Project | 27.06.01 |
| PR 1999/92 | Income tax: Mt Barker Vineyards Fig Tree Lane Vineyard Project | 27.06.01 |
| PR 1999/96 | Income tax: Norfolk Ridge Vineyards Prospectus Number 2 (post 30 June investors) | 27.06.01 |
| PR 2000/40 | Income tax: Great Southern Olive Project | 27.06.01 |
| PR 2000/45 | Income tax: Norfolk Ridge Vineyards Project – Stage 3 | 27.06.01 |
| PR 2000/46 | Income tax: Kiri Park Project | 27.06.01 |
| PR 2000/50 | Income tax: The Paulownia West Coast Project No. 3 | 27.06.01 |
| PR 2000/51 | Income tax: Exotic Timbers of Australia, ETA NT1 Project | 27.06.01 |
| PR 2000/52 | Income tax: Gunns Plantations Woodlot Project 2000 | 27.06.01 |
| PR 2000/60 | Income tax: Treecorp Clearwood Project 2000 | 27.06.01 |
| PR 2000/66 | Income tax: Australian Cricket Bat Willow Project 2000 | 27.06.01 |

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| PR 2000/74 | Income tax: Heritage Paulownia Forests Project No. 1 | 27.06.01 |
| PR 1999/71 | Income tax: Kimseed Bluegum Project | 29.06.01 |
| PR 2000/39 | Income tax: Barkworth Olive Grove Project No. 4 | 29.06.01 |
| PR 2000/112 | Income tax: Percydale Olive Estate | 18.07.01 |
| PR 2001/87 | Income tax: The Hatchling Film Project | 18.07.01 |
| PR 2000/54 | Income tax: Rosedale Vines Project | 15.08.01 |
| PR 2000/61 | Income tax: Forestry Tasmania Trees Trust 2000 | 15.08.01 |
| PR 2000/63 | Income tax: Almond Orchards Australia Robinvale 2000 | 15.08.01 |
| PR 1999/80 | Income tax: Heritage Plantations Tea Tree Oil Project No 1 | 22.08.01 |
| PR 2000/23 | Income tax: Emerald Hills Cattle Project | 22.08.01 |
| PR 2000/32 | The Olea Australis | 22.08.01 |
| PR 2000/67 | Income tax: Mountain River Food project Prospectus No 1 | 22.08.01 |
| PR 2000/80 | Income tax: ITC Hardwood Timber Project 2000 – Supplementary Prospectus | 22.08.01 |
| PR 1999/98 | Income tax: ITC Eucalyptus 1999 Esperance Project | 22.08.01 |
| PR 1999/99 | Income tax: Hanging Rock Secondo | 29.08.01 |
| PR 2001/32 | Income tax: OPAL Olive Project | 24.10.01 |
| PR 2000/36 | Income tax: Australian Olives Project No. 3 | 24.10.01 |
| PR 1999/28 | Income tax: Karri Oak Vineyard Project No. 2 | 07.11.01 |
| PR 2000/119 | Income tax: Red Earth Olives Project | 07.11.01 |
| PR 2000/116 | Income tax: Watermark Vineyard Project | 14.11.01 |
| PR 1999/41 | Income tax: Chateau Xanadu Vineyards Project | 14.11.01 |
| PR 2000/57 | Income tax: Chateau Xanadu Vineyards II | 14.11.01 |
| PR 2000/79 | Income tax: Lockie Leonard Film Scheme | 12.12.01 |
| PR 2001/92 | Income tax: Grampians Olive Project 2001 | 12.12.01 |

## Product Rulings – notices of Addenda

| Product Ruling | Title | Issue date |
|---|---|---|
| PR 1999/8 | Income tax: Australian Hardwood Management Project No. 2 | 21.02.01 |
| PR 2000/10 | Income tax: Coonawarra Wine-grape Project Investment | 21.02.01 |
| PR 1999/102 | Income tax: Shaw Vineyard Estate Project 1999 | 21.03.01 |
| PR 1999/103 | Income tax: Tiwi Islands Acacia Project No. 1 | 28.03.01 |
| PR 2000/17 | Income tax: Saint Magnus Vineyards Project | 28.03.01 |
| PR 2000/22 | Income tax: Tiwi Islands Acacia Project No. 2 | 28.03.01 |
| PR 1999/7 | Income tax: Goulburn Valley Orchards Project | 04.04.01 |
| PR 2000/11 | Income tax: Goulburn Valley Orchards 2000 Project | 04.04.01 |
| PR 2000/34 | Income tax: Heydon Park Olive Project | 04.04.01 |
| PR 2000/112 | Income tax: Percydale Olive Estate | 11.04.01 |
| PR 2001/26 | Income tax: Karri Oak Project No. 2 (Stage 3) | 02.05.01 |
| PR 2000/100 | Income tax: 2001 Timbercorp Olive Project | 09.05.01 |
| PR 2001/52 | Income tax: Plantcorp 2001 Radiata Pine Project | 09.05.01 |
| PR 2001/45 | Income tax: Black Truffle Project | 23.05.01 |
| PR 2000/70 | Income tax: deductibility of interest incurred on borrowings under the Macquarie Geared Equities Investment Facility | 23.05.01 |
| PR 1999/61 | Income tax: Coonawarra Premium Vineyard Project | 30.05.01 |

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|---|---|---|
| PR 2000/12 | Income tax: Greenock Vines Project | 30.05.01 |
| PR 2000/64 | Income tax: Carina Park Almond Project | 30.05.01 |
| PR 2000/78 | Income tax: Plantation Forestry Hardwood Project No. 3 | 30.05.01 |
| PR 2001/1 | Income tax: The Paulownia West Coast Project No. 4 | 30.05.01 |
| PR 2001/3 | Income tax: Queensland Paulownia Forests Project No. 5 | 30.05.01 |
| PR 2001/9 | Income tax: Great Southern Plantations 2001 and 2002 Projects | 30.05.01 |
| PR 2001/13 | Income tax: Australian Forests Project 2001 | 30.05.01 |
| PR 2001/28 | Income tax: Olea Australis Olive Project Stage II | 06.06.01 |
| PR 2000/31 | Income tax: WRF Kangaroo Island Plantations | 06.06.01 |
| PR 1999/11 | Income tax: The Larenta Olives Project | 06.06.01 |
| PR 2001/31 | Income tax: Tasmanian Truffle Project No. 1 | 06.06.01 |
| PR 2001/25 | Income tax: The Timber Australia Project | 06.06.01 |
| PR 1998/5 | Income tax: 1999 Timbercorp Eucalypts Project | 13.06.01 |
| PR 1999/77 | Income tax: Coonawarra Blue Gums 1999 Project | 13.06.01 |
| PR 2000/7 | Income tax: 2000 Timbercorp Eucalypts Project | 13.06.01 |
| PR 2000/41 | Income tax: The Boundary Bend Estate (J.V.Two) Project | 13.06.01 |
| PR 2000/59 | Income tax: Beechworth Winegrape Project | 13.06.01 |
| PR 2000/92 | Income tax: The Paulownia Tree Farming Project No. 2 | 13.06.01 |
| PR 2000/98 | Income tax: 2001 Timbercorp Eucalypts Project | 13.06.01 |
| PR 2000/100 | Income tax: 2001 Timbercorp Olive Project | 13.06.01 |
| PR 2001/15 | Income tax: 2001 Timbercorp Amond Project | 13.06.01 |
| PR 2001/21 | Income tax: Willmott Forests – 2001 Project | 13.06.01 |
| PR 2001/48 | Income tax: Forestry Bond 2001 | 13.06.01 |
| PR 2001/71 | Income tax: WRF Kangaroo Island Plantations 2002 | 13.06.01 |
| PR 1999/25 | Income tax: Tasmanian Forest Trust No. 7 Project | 20.06.01 |
| PR 1999/70 | Income tax: Paulownia Tree Farming Project No. 1 | 20.06.01 |
| PR 2000/30 | Income tax: Forest Rewards Sandalwood Project 2000 | 20.06.01 |
| PR 2000/75 | Income tax: Queensland Pine Forest 2000 Project | 20.06.01 |
| PR 2000/104 | Income tax: Black George Warren River Project No. 1 – Supplementary Prospectus | 20.06.01 |
| PR 2001/44 | Income tax: Carina Park Almond Stage 2 Project | 20.06.01 |
| PR 2001/45 | Income tax: Black Truffle Project 2001 | 20.06.01 |
| PR 2001/49 | Income tax: Guilderton Olives | 20.06.01 |
| PR 1999/4 | Income tax: Queensland Paulownia Forests Project No. 3 | 27.06.01 |
| PR 1999/10 | Income tax: The Paulownia West Coast Project No. 2 | 27.06.01 |
| PR 1999/18 | Income tax: Norfolk Ridge Vineyards Project | 27.06.01 |
| PR 1999/23 | Income tax: Preston Vale Vineyard Project | 27.06.01 |
| PR 1999/24 | Income tax: Murtagh of Rutherglen No 3 | 27.06.01 |
| PR 1999/29 | Income tax: Margaret River Wine Business | 27.06.01 |
| PR 1999/33 | Income tax: Mt Barker Vineyards Fig Tree Lane Vineyard Project | 27.06.01 |
| PR 1999/47 | Income tax: The Koorian Olives Project | 27.06.01 |
| PR 1999/56 | Income tax: Coonalpyn Olives Project | 27.06.01 |
| PR 1999/72 | Income tax: Northern Rivers Coffee Project No 1 | 27.06.01 |
| PR 1999/84 | Income tax: GlenKara Estate Vineyard Project | 27.06.01 |

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| PR 1999/92 | Income tax: Mt Barker Vineyards Fig Tree Lane Vineyard Project | 27.06.01 |
| PR 1999/96 | Income tax: Norfolk Ridge Vineyards Prospectus Number 2 (post 30 June investors) | 27.06.01 |
| PR 2000/40 | Income tax: Great Southern Olive Project | 27.06.01 |
| PR 2000/45 | Income tax: Norfolk Ridge Vineyards Project – Stage 3 | 27.06.01 |
| PR 2000/46 | Income tax: Kiri Park Project | 27.06.01 |
| PR 2000/50 | Income tax: The Paulownia West Coast Project No. 3 | 27.06.01 |
| PR 2000/51 | Income tax: Exotic Timbers of Australia, ETA NT1 Project | 27.06.01 |
| PR 2000/52 | Income tax: Gunns Plantations Woodlot Project 2000 | 27.06.01 |
| PR 2000/60 | Income tax: Treecorp Clearwood Project 2000 | 27.06.01 |
| PR 2000/66 | Income tax: Australian Cricket Bat Willow Project 2000 | 27.06.01 |
| PR 2000/73 | Income tax: Income tax: Great Southern Blue Gum Plantations 2000/2001 Projects | 27.06.01 |
| PR 2000/74 | Income tax: Heritage Paulownia Forests Project No. 1 | 27.06.01 |
| PR 2000/88 | Income tax: Neem Australia Project No.1 | 27.06.01 |
| PR 1999/71 | Income tax: Kimseed Bluegum Project | 29.06.01 |
| PR 2000/39 | Income tax: Barkworth Olive Grove Project No. 4 | 29.06.01 |
| PR 2000/54 | Income tax: Rosedale Vines Project | 15.08.01 |
| PR 2000/61 | Income tax: Forestry Tasmania Trees Trust 2000 | 15.08.01 |
| PR 2000/63 | Income tax: Almond Orchards Australia Robinvale 2000 | 15.08.01 |
| PR 2000/80 | Income tax: ITC Hardwood Timber Project 2000 – Supplementary Prospectus | 22.08.01 |
| PR 1999/98 | Income tax: ITC Eucalyptus 1999 Esperance Project | 22.08.01 |
| PR 2000/32 | The Olea Australis | 22.08.01 |
| PR 1999/99 | Income tax: Hanging Rock Secondo | 29.08.01 |
| PR 2001/73 | Income tax: Brooklyn Park Olive Groves Project No. 2 | 29.08.01 |
| PR 2000/36 | Income tax: Australian Olives Project No 3 | 24.10.01 |
| PR 1999/28 | Income tax: Karri Oak Vineyard Project No. 2 | 07.11.01 |
| PR 1999/41 | Income tax: Chateau Xanadu Vineyards Project | 14.11.01 |
| PR 2000/57 | Income tax: Chateau Xanadu Vineyards II | 14.11.01 |
| PR 2000/18 | Income tax: Australian Blue Gum 2000 | 21.11.01 |
| PR 1999/12 | Income tax: deductibility of interest incurred on borrowings under the Macquarie Sharemarket Lending Facility for the purchase of units in the Macquarie Enhanced Index Trust | 05.12.01 |

## Product Rulings – notices of Erratum

| Product Ruling | Title | Issue date |
|---|---|---|
| PR 2001/65 | Income tax: NoRegrets Managed Retail Franchise Project | 30.05.01 |
| PR 2001/68 | Income tax: "Liquid Bridge" Film Investment | 06.06.01 |
| PR 2001/64 | Income tax: film investment – The Secret of a Glass of Water | 13.06.01 |
| PR 2001/68 | Income tax: "Liquid Bridge" Film Investment | 13.06.01 |

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|---|---|---|
| PR 2001/80 | Income tax: deductiblity of interest incurred on borrowings under the ANZ Protected Equity Portfolio Product | 20.06.01 |

## Product Rulings withdrawn as a consequence of another Ruling issued

| Product Ruling withdrawn | Title | Issue date | Replaced by |
|---|---|---|---|
| PR 2000/89 | Incomet tax: Settlement 22 Managed Investment Scheme | 31.01.01 | PR 2001/8 |
| PR 2000/97 | Income tax: Summerhill Orchards 2000 (revised arrangment) | 07.02.01 | PR 2001/12 |
| PR 2001/8 | Income tax: Settlement 22 Managed Investment Scheme | 28.03.01 | PR 2001/27 |
| PR 2000/34 | Income tax: Heydon Park Olive Proejct | 04.04.01 | PR 2001/33 |
| PR 2000/83 | Income tax: Kimseed Eucalyptus Esperance 2000 Project – Supplementary Prospectus April 2001 | 26.04.01 | PR 2001/53 |
| PR 2000/78 | Income tax: Plantation Forestry Hardwood Project No. 3 | 30.05.01 | PR 2001/70 |
| PR 2001/19 | Income tax: WRF Kangaroo Island Plantations 2002 | 30.05.01 | PR 2001/71 |
| PR 2000/113 | Income tax: TFS Sandalwood Project 2000 | 30.05.01 | PR 2001/72 |
| PR 2001/10 | Income tax: APT Planatation Project No. 11 | 06.06.01 | PR 2001/77 |
| PR 2001/5 | Income tax: Tanunda Hill Vineyard Project | 06.06.01 | PR 2001/78 |
| PR 2000/59 | Income tax: Beechworth Winegrape Project | 13.06.01 | PR 2001/83 |
| PR 2001/40 | Income tax: Mount Bellarine Vineyard Project | 15.06.01 | PR 2001/88 |
| PR 2000/88 | Income tax: Neem Australia Project No. 1 | 27.06.01 | PR 2001/94 |
| PR 2001/11 | Income tax: Palandri 2000 Project – Second Offering | 10.10.01 | PR 2001/130 |
| PR 2001/94 | Income tax: Neem Australia Project No. 1 | 17.10.01 | PR 2001/135 |
| PR 2001/3 | Income tax: Queensland Paulownia Forests Project No 5: Extended Offer | 31.10.01 | PR 2001/141 |
| PR 2001/71 | Income tax: WRF Kangaroo Island Plantations 2002 | 31.10.01 | PR 2001/142 |

# Class Rulings

7. During the calendar year 2001 the Commissioner of Taxation issued:

### Class Rulings

| Product Ruling withdrawn | Title | Issue date |
|---|---|---|
| CR 2001/1 | Income tax: Class Rulings system | 28.02.01 |
| CR 2001/2 | Income tax: Approved Early Retirement Scheme (SA – ETVSP) | 04.04.01 |
| CR 2001/3 | Income tax: Approved Early Retirement Scheme (BHP Coal Pty Ltd – Voluntary Early Retirement Scheme) | 04.04.01 |
| CR 2001/4 | Income tax: Approved Early Retirement Scheme (Museum Victoria – VDP) | 04.04.01 |
| CR 2001/5 | Income tax: capital gains: scrip for scrip roll-over: acquisition of Medical Monitors Pty Ltd by Defiance Mining NL | 11.04.01 |
| CR 2001/6 | Income tax: Approved Early Retirement Scheme – Department of Housing, NSW | 11.04.01 |
| CR 2001/7 | Income tax: Coca-Cola Amatil capital returm | 18.04.01 |
| CR 2001/8 | Income tax: Swinburne University Bachelor of Information Technology Scholarship | 18.04.01 |
| CR 2001/9 | Income tax: Approved Early Retirement Scheme – Pasminco Ltd & Subsidiaries | 26.04.01 |
| CR 2001/10 | Income tax: Approved Early Retirement Scheme for (Department of Human Services, Kew Residential Services) | 26.04.01 |
| CR 2001/11 | Income tax: Approved Early Retirement Scheme (Department of Human Services, Service Development Branch) | 26.04.01 |
| CR 2001/12 | Income tax: Income tax: Approved Early Retirement Scheme for The University of Sydney | 26.04.01 |
| CR 2001/13 | Income tax: Approved Early Retirement Scheme for Borden Chemical Sustralia Pty Ltd | 02.05.01 |
| CR 2001/14 | Income tax: Approved Early Retirement Scheme for Yallourn Energy Pty Ltd | 09.05.01 |
| CR 2001/15 | Income tax: Approved Early Retirement Scheme for the Department of Natural Resources and the Environemnt | 09.05.01 |
| CR 2001/16 | Income tax: The assessability of bonuses received on the termination of the V and T Investment Bond Fund for investments held for less than 10 years | 23.05.01 |
| CR 2001/17 | Income tax: capital gains: scrip for scrip roll-over: proposed takeover of Cable & Wireless Optus Limited by SingTel Australia Investment Ltd | 06.06.01 |
| CR 2001/18 | Income tax: Employee Share Scheme: Exemption Conditions: disposal of shares held under the Cable and Wireless Optus Limited Exempt Share Plan within three years of acquisitions | 06.06.01 |

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|---|---|---|
| CR 2001/19 | Income tax: Approved Early Retirement Scheme for Deakin University | 13.06.01 |
| CR 2001/20 | Income tax: Department of Human Services – Approved Early Retirement Scheme | 13.06.01 |
| CR 2001/21 | Income tax: Approved Early Retirement Scheme for the Department of Infrastructure | 13.06.01 |
| CR 2001/22 | Income tax: The University of Melbourne – Approved Early Retirement Scheme | 13.06.01 |
| CR 2001/23 | Income tax: capital gains: Employee share scheme: National Australia Bank | 20.06.01 |
| CR 2001/24 | Income Tax: Singapore Airlines Limited – bone fide redundancy payments | 27.06.01 |
| CR 2001/25 | Income tax: Amount received from the Victorian Farmers Federation to assist with the cost of construction of stock over/underpasses | 27.06.01 |
| CR 2001/26 | Income tax: capital gains: variation of share rights: Golden Circle Limited | 11.07.01 |
| CR 2001/27 | Income tax: Employee Share Scheme: Exemption Conditions: disposal of shares held under the Spicers Paper Limited General Employee Share Plan within three years of acquisition | 11.07.01 |
| CR 2001/28 | Income tax: capital gains: employee share scheme: Telstra Corporation Limited | 18.07.01 |
| CR 2001/29 | Income tax: Approved Early Retirement Scheme – Overseas Projects Corporation of Victoria Limited | 18.07.01 |
| CR 2001/30 | Income tax: Approved Early Retirement Scheme – Albany International Pty Ltd | 18.07.01 |
| CR 2001/31 | Income tax: Approved Early Retirement Scheme – Queensland University of Technology | 18.07.01 |
| CR 2001/32 | Income tax: Approved Early Retirement Scheme – State Revenue Office Victoria | 25.07.01 |
| CR 2001/33 | Income tax: exempt foreign employment income: Australian Federal Police employees stationed in the Solomon Islands as members of the International Peace Monitoring Team | 01.08.01 |
| CR 2001/34 | Income tax: Approved Early Retirement Scheme – NSW Legal Aid Commission | 15.08.01 |
| CR 2001/35 | Income tax: Approved Early Retirement Scheme - NSW Department of Industrial Relations | 15.08.01 |
| CR 2001/36 | Income tax: Capital Restructure By Resolute Ltd | 22.08.01 |
| CR 2001/37 | Income tax: Approved Early Retirement Scheme – Robert Bosch (Australia) Propietary Limited | 22.08.01 |
| CR 2001/38 | Income tax: The deductibility for Queensland school employees of the cost of obtaining a suitability notice for working with children | 29.08.01 |
| CR 2001/39 | Income tax: capital gains: scrip for scrip roll-over: proposed takeover of F H Faulding & Co Limited by the Mayne Nickless Limited Group | 29.08.01 |
| CR 2001/40 | Income tax: Approved Early Retirement Scheme – Victorian Police Department | 29.08.01 |
| CR 2001/41 | Income tax: Approved Early Retirement Scheme - South Australian Water Corporation | 29.08.01 |
| CR 2001/42 | Income tax: exempt income: approved projects: MH Matrix | 05.09.01 |

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| CR 2001/43 | Income tax: Approved Early Retirement Scheme – NSW Department of Public Works and Services | 05.09.01 |
| CR 2001/44 | Income tax: Approved Early Retirement Scheme – University of Queensland | 12.09.01 |
| CR 2001/45 | Income tax: Approved Early Retirement Scheme – Office of Gambling Regulation (Victoria) | 12.09.01 |
| CR 2001/46 | Income tax: Approved Early Retirement Scheme – Diocese of Toowoomba Catholic Education Office | 19.09.01 |
| CR 2001/47 | Income tax: Q Invest Retirement Fund | 19.09.01 |
| CR 2001/48 | Income tax: Share Buy-Back (Just Jean Group Limited) | 19.09.01 |
| CR 2001/49 | Income tax: Deferred Salary Payment Agreement for Sabbatical Leave Scheme by Employees of the Department of Agriculture | 26.09.01 |
| CR 2001/50 | Income tax: Approved Early Retirement Scheme – Mount Isa Business Unit | 10.10.01 |
| CR 2001/51 | Income tax: capital gains: scrip for scrip roll-over: acquisition of Howard Smith Limited by Wesfarmers Retail Pty Ltd, a 100% owned subsidiary of Wesfarmers Limited | 17.10.01 |
| CR 2001/52 | Income tax: Approved Early Retirement Scheme – Department of Infrastructure | 24.10.01 |
| CR 2001/53 | Income tax: Approved Early Retirement Scheme – Department of Information Technology and Management | 24.10.01 |
| CR 2001/54 | Income tax: Approved Early Retirement Scheme – New South Wales Department of State and Regional Development | 24.10.01 |
| CR 2001/55 | Income tax: Approved Early Retirement Scheme – Burnie Port Corporation Pty Ltd | 24.10.01 |
| CR 2001/56 | Income tax: Approved Early Retirement Scheme – Adelaide University | 24.10.01 |
| CR 2001/57 | Income tax: Approved Early Retirement Scheme – NSW Department of Mineral Resources | 31.10.01 |
| CR 2001/58 | Income tax: Approved Early Retirement Scheme – The Trustees of the Christian Brothers (Queensland) | 31.10.01 |
| CR 2001/59 | Income tax: Approved Early Retirement Scheme – Australian Provincial Newspapers Limited | 07.11.01 |
| CR 2001/60 | Income tax: capital gains: personal-use assets: Contributors to the Credicare Health Fund | 07.11.01 |
| CR 2001/61 | Income tax: Approved Early Retirement Scheme - Loy Yang Power Management Pty Ltd | 07.11.01 |
| CR 2001/62 | Income tax: Approved Early Retirement Scheme – Niro Australia Pty Ltd | 07.11.01 |
| CR 2001/63 | Income tax: State of Queensland 8% Exchanging Instalment Note - Series 2 exchanging on 31 October 2001 for Suncorp-Metway Limited ordinary shares | 07.11.01 |
| CR 2001/64 | Income tax: Approved Early Retirement Scheme – Royal Automobile Club of Victoria | 14.11.01 |
| CR 2001/65 | Income tax: Approved Early Retirement Scheme – Royal Melbourne Institute of Technology | 14.11.01 |
| CR 2001/66 | Income tax: Approved Early Retirement Scheme – Ministry of Energy and Utilities | 14.11.01 |

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|---|---|---|
| CR 2001/67 | Income tax: Approved Early Retirement Scheme – Department of Administrative and Information Services (Ports Corporation South Australia) | 14.11.01 |
| CR 2001/68 | Income tax: SA Rural Education Scholarship | 21.11.01 |
| CR 2001/69 | Income tax: Off-Market Share Buy-Back by Santos Ltd | 28.11.01 |
| CR 2001/70 | Income tax: Preference Share Issue (Santos Ltd reset, convertible preference shares) | 28.11.01 |
| CR 2001/71 | Income tax: Approved Early Retirement Scheme – TAFE Queensland | 28.11.01 |
| CR 2001/72 | Income tax: Approved Early Retirement Scheme – National Australia Bank Ltd. Business Financial Services Division | 28.11.01 |
| CR 2001/73 | Income tax: Approved Early Retirement Scheme – Diocesan Catholic Education Office, Diocese of Rockhampton | 28.11.01 |
| CR 2001/74 | Income tax: Approved Early Retirement Scheme – VAW Kurri Kurri Pty Limited | 28.11.01 |
| CR 2001/75 | Income tax: capital gains: St George Bank Limited share buy-back and issue of Sell Back Rights | 05.12.01 |
| CR 2001/76 | Income tax: Employee Incentive Plan: Brightstar Environmental Employee Incentive Plan | 05.12.01 |
| CR 2001/77 | Income tax: Whether the allowance paid to employees of Stabilised Pavements Australia Pty Ltd is a travel allowance or living-away-from-home allowance and substantiation requirements | 05.12.01 |
| CR 2001/78 | Income tax: The deductibility of the cost of obtaining a suitability notice for working with children for contractors employed by the Department of Education, Training and Youth Affairs under the Aboriginal Tutorial Assistance Scheme | 05.12.01 |
| CR 2001/79 | Income tax: Approved Early Retirement Scheme – Melbourne Convention and Exhibition Trust | 12.12.01 |
| CR 2001/80 | Income tax: Approved Early Retirement Scheme – Energy Brix Australia Corporation Pty Ltd | 12.12.01 |
| CR 2001/81 | Income tax: exempt foreign employment income: 23AG: Boeing Australia Limited | 12.12.01 |
| CR 2001/82 | Income Tax: Employee Share Scheme: Executive Option and Performance Right Plan Pacifica Group Ltd | 19.12.01 |
| CR 2001/83 | Income tax: Approved Early Retirement Scheme – Water Corporation (Western Australia) | 19.12.01 |
| CR 2001/84 | Income tax: Approved Early Retirement Scheme – NSW Roads and Traffic Authority | 19.12.01 |
| CR 2001/85 | Income tax: capital gains: scrip for scrip roll-over: exchange of units in the Transurban City Link Unit Trust for units in the Transurban Holding Trust | 19.12.01 |

## Class Rulings – notices of Addenda

| Class Ruling | Title | Issue date |
|---|---|---|
| CR 2000/17 | Income tax: capital gains: scrip for scrip roll-over: proposed takeover of Cable & Wireless Optus Limited by SingTel Australia Investment Ltd | 22.08.01 |

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|---|---|---|
| CR 2001/2 | Income tax: Approved Early Retirement Scheme (SA – ETVSP) | 19.09.01 |
| CR 2001/14 | Income tax: Approved Early Retirement Scheme for Yallourn Energy Pty Ltd | 26.09.01 |

# Superannuation Contributions

8. During the calendar year 2001 the Commissioner of Taxation issued:

### Superannuation Contributions Determinations

| Ruling | Title | Issue date |
|---|---|---|
| SCD 2001/1 | Superannuation contributions: what is the surcharge threshold for the 2001-2001 financial year under the *Superannuation Contributions Tax (Assessment and Collection) Act 1997?* | 13.06.01 |
| SCD 2001/2 | Superannuation contributions: what are the indexable amounts for the 2001-2002 financial year under the *Termination Payments Tax Imposition Act 1997?* | 13.06.01 |
| SCD 2001/3 | Superannuation contributions: what is the surcharge threshold for the 2001-2002 financial year under the *Termination Payments Tax (Assessment and Collection) Act 1997?* | 13.06.01 |
| SCD 2001/4 | Superannuation contributions: what are the surchargeable contributions threshold and the indexable amounts for the 2001-2002 financial year under the *Superannuation Contributions Tax Imposition Act 1997?* | 13.06.01 |

# Superannuation Guarantee

9. During the calendar year 2001 the Commissioner of Taxation issued:

### Superannuation Guarantee Determinations

| Ruling | Title | Issue date |
|---|---|---|
| SGD 2001/1 | Superannuation Guarantee: what is the maximum contribution base for each contribution period in 2001-2002? | 13.06.01 |

### Superannuation Guarantee Determinations – notices of withdrawal

| Ruling | Title | Issue date |
|---|---|---|
| SGD 98/2 | Superannuation Guarantee: are superannuation contributions, which result from a salary sacrifice arrangement, made by the employer or are they made by the employee? | 07.11.01 |

# Taxation Rulings

10. During the calendar year 2001 the Commissioner of Taxation issued:

### Draft Taxation Rulings

| Ruling | Title | Issue date |
|---|---|---|
| TR 2001/D1 | Income tax: deductibility of payments incurred on moneys raised through the issue of perpetual notes | 21.02.01 |
| TR 2001/D2 | Income tax: the taxation consequences for taxpayers issuing certain stapled securities | 21.02.01 |
| TR 2001/D3 | Income tax: what is a personal srvices business | 04.04.01 |
| TR 2001/D4 | Income tax: the meaning of a persional services income | 04.04.01 |
| TR 2001/D5 | Income tax, fringe benefits tax and superannuation guarantee: salary sacrifice arrangements | 18.04.01 |
| TR 2001/D6 | Income tax: Permanent establishment - What is 'a place at or through which [a] person carries on any business' in the definition of permanent establishment in subsection 6(1) of the *Income Tax Assessment Act 1936*? | 15.08.01 |
| TR 2001/D7 | Income tax: Australian films – Division 10B tax concessions | 26.09.01 |
| TR 2001/D8 | Income tax: meaning of "Arm's Length" for the purpose of subsection 47A(7) of the *Income Tax Assessment Act 1936* (ITAA 1936) dividend deeming provisions | 03.10.01 |
| TR 2001/D9 | Income tax: withholding from payments where recipient does not quote ABN | 05.10.01 |
| TR 2001/D10 | Income tax: deductibility of payments to strike funds | 12.10.01 |
| TR 2001/D11 | Income tax: assessability of payments received from strike funds | 12.10.01 |
| TR 2001/D12 | Income tax: whether the holding of pre-emptive rights, call options and put options constitute a contingent entitlement to acquire for controlled foreign company (CFC) and foreign investment fund (FIF) purposes | 17.10.01 |
| TR 2001/D13 | Income tax: taxatio implications of the Century Yuasa Batteries decision | 17.10.01 |

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| TR 2001/D15 | Income tax: licence arrangements for intellectual property – Division 40 tax avoidance schemes | 19.12.01 |
| TR 2001/D16 | Income tax: Simplified Tax System: eligibility – grouping rules (*STS affiliate, control of non fixed trusts) | 19.12.01 |

## Draft Taxation Rulings – notices of Withdrawal

| Ruling | Title | Issue date |
|---|---|---|
| TR 1999/D7 | Income tax, fringe benefits tax and superannuation guarantee: salary sacrifice arrangments | 16.05.01 |
| TR 94/28 | Income tax: list of points in isolated areas for zone rebate purposes | 17.10.01 |

## Draft Taxation Rulings – notices of Addenda

| Ruling | Title | Issue date |
|---|---|---|
| TR 2000/18 | Income tax: depreciation effective life | 19.12.01 |

## Taxation Rulings

| Ruling | Title | Issue date |
|---|---|---|
| TR 2000/List | Income tax and other taxes: Determinations, Rulings and notices of withdrawal and addendum issued in 2000. | 10.01.01 |
| TR 2001/1 | Income tax: assessability of amounts from the sale of wheat and grain to AWB (International) Limited or AWB (Australia) Limited | 04.04.01 |
| TR 2001/2 | Fringe benefits tax: the operation of the new fringe benefits tax gross-up formula to apply from 1 April 2000 | 18.05.01 |
| TR 2001/3 | Income tax: penalty tax and trusts | 16.05.01 |
| TR 2001/4 | Income tax: reasonable allowances amounts for the 2001-2002 income year. | 27.06.01 |
| TR 2001/5 | Income tax: assessability of amounts from the sale of barley, grain or other commodities to ABB Grain Export Limited or ABB Grain Limited | 25.07.01 |
| TR 2001/6 | Income tax: deductibility of commercial website expenditure | 25.07.01 |
| TR 2001/7 | Income tax: the meaning of personal services income | 31.08.01 |
| TR 2001/8 | Income tax: what is a personal services business | 31.08.01 |
| TR 2001/9 | Income tax: agency development loans | 19.09.01 |
| TR 2001/10 | Income tax: fringe benefits tax and superannuation guarantee: salary sacrifice arrangements | 10.10.01 |
| TR 2001/11 | Income tax: international transfer pricing – operation of Australia's permanent establishment attribution rules | 31.10.01 |
| TR 2001/12 | Income tax and capital gains tax: capital gains in pre-CGT tax treaties | 19.12.01 |
| TR 2001/13 | Income tax: Interpreting Australia's Double Tax Agreements | 19.12.01 |

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|---|---|---|
| TR 2001/14 | Income tax: Division 35 - non-commercial business losses | 19.12.01 |
| TR 2001/List | Income tax and other taxes: Determinations, Rulings, notices of withdrawal, addendum and erratum issued in 2001 | 19.12.01 |

### Taxation Rulings – notices of Partial Withdrawal

| Ruling | Title | Issue date |
|---|---|---|
| TR 2001/2 | Fringe benefits tax: the operation of the new fringe benefits tax gross-up formula to apply from 1 April 2000 | 12.09.01 |

### Taxation Rulings – notices of Addenda

| Ruling | Title | Issue date |
|---|---|---|
| TR 2000/18 | Income tax: depreciation effective life | 10.01.01 |
| TR 2001/2 | Fringe benefits tax: the operation of the new fringe benefits tax gross-up formula to apply from 1 April 2000 | 23.05.01 |
| TR 2000/18 | Income tax: depreciation effective life | 29.06.01 |
| TR 2001/2 | Fringe benefits tax: the operation of the new fringe benefits tax gross-up formula to apply from 1 April 2000 | 12.09.01 |

### Taxation Rulings – notices of Erratum

| Ruling | Title | Issue date |
|---|---|---|
| TR 2001/1 | Income tax: Assessability of amounts from the sale of wheat and grain to AWB (International) Limited or AWB (Australia) Limited | 11.04.01 |

# Taxation Determinations

11. During the calendar year 2001 the Commissioner of Taxation issued:

### Draft Taxation Determinations

| Ruling | Title | Issue date |
|---|---|---|
| TD 2001/D1 | Income tax: which benchmark interest rate does a private company with a substituted accounting period in lieu of the year of income ending on 30 June use for the purposes of Division 7A of Part III of the Income Tax Assessment Act 1936 ('the Act')? | 10.01.01 |

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|---|---|---|
| TD 2001/D2 | Income tax: capital gains: how do Parts 3-1 and 3-3 of the *Income Tax Assessment Act 1997* ('the 1997 Act') treat:<br>(a) a final liquidation distribution; and<br>(b) an interim liquidation distribution?<br>and what are the capital gains consequences if all or part of a final liquidation distribution is deemed by subsection 47(1) of the *Income Tax Assessment Act 1936* ('the 1936 Act') to be a dividend paid out of profits and therefore assessable income of a shareholder under subsection 44(1) of the 1936 Act? | 11.04.01 |
| TD 2001/D3 | Income tax: capital gains: how is Division 19B of Part IIIA of the *Income Tax Assessment Act 1936* applied to a share value shifting arrangement that is 'neutral' for each shareholder in a company? | 26.04.01 |
| TD 2001/D4 | Income tax: What are the obligations under the *Income Tax Assessment Act 1936* where a business chooses to keep some of its records as encrypted information? | 30.05.01 |
| TD 2001/D5 | Income tax: Interest paid by a company on bearer debentures - for the purposes of paragraph 126(1)(e) of the *Income Tax Assessment Act 1936* does the term 'holder of the debenture' mean the person in possession of the debenture? | 27.06.01 |
| TD 2001/D6 | Income tax: What characteristics of financial arrangements regarding investment in Australian films will result in the denial of a Division 10B tax concession? | 08.08.01 |
| TD 2001/D7 | Income tax: capital gains: what are the capital gains tax consequences for a beneficiary of a discretionary trust who renounces their interest in the trust? | 29.08.01 |
| TD 2001/D8 | Income tax: capital gains: can a shareholder in HIH Insurance Limited choose to make a capital loss on a share in that company under CGT event G3 (about a liquidator declaring shares worthless) in section 104-145 of the *Income Tax Assessment Act 1997*? | 31.10.01 |
| TD 2001/D9 | Income tax: capital gains: what is the first element of the cost base and reduced cost base of a share in a company you acquire in exchange for a share in another company in a takeover or merger? | 07.11.01 |
| TD 2001/D10 | Income tax: capital gains: what is meant by the phrase 'at least 12 months before' in subsection 115-25(1) of *the Income Tax Assessment Act 1997* (about the CGT discount) and subsection 114-10(1) (about indexation)? | 07.11.01 |
| TD 2001/D11 | Income tax: capital gains: if expenditure incurred to increase an asset's value is reflected in that value at the time a CGT event happens to the asset, is this sufficient to satisfy the requirement in the fourth element of cost base and reduced cost base (subsections 110-25(5) and 110-55(2) of the *Income Tax Assessment Act 1997* ('ITAA 1997')) that the expenditure be reflected in the 'state' or 'nature' of the asset at the time of the CGT event? | 07.11.01 |

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|---|---|---|
| TD 2001/D12 | Income tax: is a payment by a taxpayer to a fighting fund deductible to the taxpayer under section 25-5 of the *Income Tax Assessment Act 1997* ('the Act') where it is set up to fund litigation, negotiate a settlement outcome, or to otherwise manage an income tax dispute arising from an investment or scheme? | 07.11.01 |
| TD 2001/D13 | Income tax: capital gains: scrip for scrip roll-over: can the exchange of an interest (not being a unit) in a trust for a unit in a unit trust satisfy the requirements in subparagraph 124-781(1)(a)(i) of the *Income Tax Assessment Act 1997*? | 14.11.01 |
| TD 2001/D14 | Income tax: which country is for the purposes of Part X of the *Income Tax Assessment Act 1936* (the Act) the country of residence of a UK Limited Partnership (LP), a US LP, a UK Limited Liability Partnership (LLP) and a US LLP being a non-resident corporate limited partnership within Part III Division 5A of the Act? | 12.12.01 |
| TD 2001/D15 | Income tax: does a 'permitted purpose' under subsection 160APAAAA(2) of the *Income Tax Assessment Act 1936* include the acquisition of equity in a foreign entity (including a subsidiary) by an Australian authorised deposit-taking institution (ADI) through a permanent establishment out of funds raised by the permanent establishment from the issue of non-share equity interests that meet the conditions of subsection 160APAAAA(1)? | 19.12.01 |
| TD 2001/D16 | Income tax: what is a 'distribution line' in the electricity distribution industry for the purposes of the expression 'depreciating assets' in section 40-100 of the Income Tax Assessment Act 1997? | 19.12.01 |

## Draft Taxation Determinations - notices of Withdrawal

| Ruling | Title | Issue date |
|---|---|---|
| TD 96/D4 | Income tax: capital gains: how does Division 19B of Part IIIA of the *Income Tax Assessment Act 1936* apply to a share value shifting arrangement involving a share value shift from shares held by a person to shares held by an associate which is matched by a corresponding value shift from the associate's shares to that person's shares? | 26.04.01 |
| TD 2001/D6 | What characteristics of financial arrangements regarding investment in Australian films will result in the denial of a Division 10B tax concession? | 08.08.01 |
| TD 93/D269 | Income tax: substantiation: are there circumstances in which the Commissioner will accept a copy of the document where the taxpayer needs to retain the original? | 15.08.01 |

## Taxation Determinations

| Ruling | Title | Issue date |
|---|---|---|
| TD 2001/1 | Income tax: what is the benchmark interest rate applicable for the year of income commencing on 1 July 2000 for the purposes of Division 7A of Part III of the Income Tax Assessment Act 1936 ('the Act') and how is it used? | 10.01.01 |
| TD 2001/2 | Income tax: Can a private company be taken to have paid a dividend to another company pursuant to either section 109C of the Income Tax Assessment Act 1936 (the Act) where the other company is the target entity under an interposed entity arrangement? | 06.06.01 |
| TD 2001/3 | Income tax: Interest Withholding Tax Exemption - for the purposes of subsection 128F(5) of the *Income Tax Assessment Act 1936*, when will a company be taken to have the requisite knowledge or suspicion that the debenture or an interest in the debenture was being, or would later be, acquired by an associate? | 28.03.01 |
| TD 2001/4 | Fringe benefits tax: what is the benchmark interest rate to be used for the fringe benefits tax (FBT) year commencing on 1 April 2001? | 26.04.01 |
| TD 2001/5 | Fringe benefits tax: for the purposes of Division 7 of the *Fringe Benefits Tax Assessment Act 1986* (FBTAA), what amount represents a reasonable food component of a living-away-from-home allowance for expatriate employees for the fringe benefits tax year commencing on 1 April 2001? | 26.04.01 |
| TD 2001/6 | Fringe benefits tax: for the purposes of Section 135C of the *Fringe Benefits Tax Assessment Act 1986* (FBTAA) what is the exemption threshold for the fringe benefits tax (FBT) year commencing on 1 April 2001? | 26.04.01 |
| TD 2001/7 | Fringe benefits tax: what are the indexation factors for valuing non-remote housing for the fringe benefits tax (FBT) year commencing on 1 April 2001? | 26.04.01 |
| TD 2001/8 | Fringe benefits tax: what are the rates to be applied on a cents per kilometre basis for calculating the taxable value of a fringe benefit arising from the private use of a motor vehicle other than a car for the fringe benefits tax (FBT) year commencing on 1 April 2001? | 26.04.01 |
| TD 2001/9 | Income tax: capital gains: if you receive compensation for a compulsory acquisition of part of a CGT asset which you own, how do you treat that compensation - for cost base purposes - to the extent to which it reflects a reduction in value of the remaining part of your asset? | 26.04.01 |
| TD 2001/10 | Income tax: is the payer of a payment which is subject to Pay As You Go withholding required to give the recipient of the payment a payment summary and a copy of that payment summary? | 09.05.01 |

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| TD 2001/11 | Fringe benefits tax: for the purposes of section 39A of the *Fringe Benefits Tax Assessment Act 1986* (FBTAA) what is the car parking threshold for the fringe benefits tax (FBT) year commencing 1 April 2001? | 06.06.01 |
| TD 2001/12 | Income tax: capital gains: what is the improvement threshold for the 2001-2002 income year under section 108-85 of the *Income Tax Assessment Act 1997*? | 13.06.01 |
| TD 2001/13 | Income tax: capital gains: for the purpose of the expression 'acquired the share' in paragraph 110-55(7)(b) of the *Income Tax Assessment Act 1997* ('the 1997 Act') does *acquired* include a case where you are *taken* to have *acquired* the share for an acquisition cost equal to its market value? | 13.06.01 |
| TD 2001/14 | Income tax: capital gains: how is a distribution of the 'exempt' 50% component of a capital gain attributable to goodwill (as worked out in accordance with paragraph 47(1A)(b) of the *Income Tax Assessment Act 1936* ('the 1936 Act')) treated for the purposes of:<br>(a) sections 47 and 44 of the 1936 Act; and<br>(b) the capital gains provisions in the *Income Tax Assessment Act 1997* ('the 1997 Act');<br>when a company's business ends and the capital gain is distributed to shareholders by a liquidator in the course of winding up the company? | 13.06.01 |
| TD 2001/15 | Income tax: what are the thresholds and limits for superannuation amounts in 2001-2001? | 20.06.01 |
| TD 2001/16 | Income tax: capital gains: if a gain company pays a loss company an amount (a subvention payment) equal to the tax benefit of a net capital loss transferred under Subdivision 170-B of the *Income Tax Assessment Act 1997*, does this ensure that no cost base and reduced cost base reductions are required to direct and indirect interests in the loss company under section 170-175? | 04.07.01 |
| TD 2001/17 | Income tax: capital gains: if a company transferred a net capital loss under Subdivision 170-B of the *Income Tax Assessment Act 1997*:<br>(a) when do the adjustments required by section 170-175 or 170-180 to the cost base and reduced cost base of a group company's interest in the loss company or the gain company take effect; and<br>(b) what happens if a subvention payment (loss company) or a tax benefit (gain company) that would otherwise be taken into account in determining the amount of any adjustment, is no longer reflected in the market value of an interest at the time a CGT event happens to it because the subvention payment or tax benefit has been distributed as a dividend? | 04.07.01 |
| TD 2001/18 | Income tax: which benchmark interest rate does a private company with a substituted accounting period in lieu of the year of income ending on 30 June use for the purposes of Division 7A of Part III of the *Income Tax Assessment Act 1936* ('the Act')? | 08.08.01 |

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|---|---|---|
| TD 2001/19 | Interest paid by a company on bearer debentures: for the purposes of paragraph 126(1)(e) of the *Income Tax Assessment Act 1936* does the term 'holder of the debenture' mean the person in possession of the debenture? | 08.08.01 |
| TD 2001/20 | what is the benchmark interest rate applicable for the year of income that commenced on 1 July 2001 for the purposes of Division 7A of Part III of the *Income Tax Assessment Act 1936* and how is it used? | 08.08.01 |
| TD 2001/21 | Income tax: Is salary paid to a French resident employed as an assistant teacher in an Australian school exempt income? | 03.10.01 |
| TD 2001/22 | Income tax: Is salary paid to a German resident employed as an assistant teacher in an Australian school exempt income? | 03.10.01 |
| TD 2001/23 | Income tax: Is salary paid to an Italian resident employed as an assistant teacher in an Australian school exempt income? | 03.10.01 |
| TD 2001/24 | Income tax: Is salary paid to a Japanese resident employed as an assistant teacher in an Australian school exempt income? | 03.10.01 |
| TD 2001/25 | Income tax: value of good taken from stock for private use | 17.10.01 |
| TD 2001/26 | Income tax: capital gains: what are the capital gains tax consequences for a beneficiary of a discretionary trust who renounces their interest in the trust? | 31.10.01 |
| TD 2001/27 | Income tax: capital gains: how do Parts 3-1 and 3-3 of the *Income Tax Assessment Act 1997* ('ITAA 1997') treat:<br>(a) a final liquidation distribution, including where all or part of it is deemed by subsection 47(1) of *the Income Tax Assessment Act 1936* ('ITAA 1936') to be a dividend; and<br>an interim liquidation distribution to the extent it is not deemed to be a dividend by subsection 47(1)? | 07.11.01 |

## Taxation Determinations - Notices of Withdrawal

| Ruling | Title | Issue date |
|---|---|---|
| TD 92/9 | Income tax: income from sale of wheat | 05.04.01 |
| TD 97/7 | Income tax: in what circumstances will the Commissioner register a transitional RBL of a taxpayer under regulation 53E of the Income Tax Regulations after the general extension date of 4 April 1997? | 09.05.01 |
| TD 94/20 | Income tax: is a lease acceptable if it is based on a $1 residual value or if the lease is for the useful life of the asset? | 29.06.01 |
| TD 94/90 | Income tax: capital gains: when should an increase be made under subsection 160ZP(14) of the *Income Tax Assessment Act 1936* to the cost base, indexed cost base or reduced cost base of shares or debt held in a group company into which a net capital loss is transferred? | 04.07.01 |

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|---|---|---|
| TD 95/12 | Income tax: capital gains: how should interim and final liquidation distributions received by shareholders be treated for CGT purposes? | 07.11.01 |
| TD 95/13 | Income tax: capital gains: how does Part IIIA of *the Income Tax Assessment Act 1936* operate if all or part of a liquidator's final distribution is deemed by subsection 47(1) to be a dividend out of profits and therefore assessable income of a shareholder under subsection 44(1)? | 07.11.01 |

## Taxation Determinations - Notices of Partial Withdrawal

| Ruling | Title | Issue date |
|---|---|---|
| TD 95/27 | Income tax: does the interest paid by a taxpayer on a loan to purchase a motor vehicle used for income-producing purposes (but not in carrying on a business) continue to be an allowable deduction under subsection 51(1) of the *Income Tax Assessment Act 1936* after disposal of the vehicle? | 29.06.01 |

## Taxation Determinations - Notices of Addenda

| Ruling | Title | Issue date |
|---|---|---|
| TD 2000/54 | Income tax: can a taxpayer calculate their Pay As You Go (PAYG) instalment amount for an instalment quarter having regard to their commercial accounting periods if they have changed the day on which their tax period ends under section 27-35 of A New Tax System (Goods and Services Tax) Act 1999? | 10.01.01 |
| TD 98/22 | Income tax: under Division 7A of Part III of the *Income Tax Assessment Act 1936* ('the Act'), how is the benchmark interest rate used for private company loans to shareholders or associates? | 31.01.01 |

## Taxation Determinations - Notices of Erratum

| Ruling | Title | Issue date |
|---|---|---|
| TD 2000/23 | Income tax: what are the thresholds and limits for superannuation amounts in 2000-2001? | 20.06.01 |
| TD 1996/24 | Income tax: what are the new thresholds and limits for superannuation amounts? | 20.06.01 |
| TD 1998/12 | Income tax: what are the thresholds and limits for superannuation amounts in 1998-99? | 20.06.01 |
| TD 1997/11 | Income tax: what are the thresholds and limits for superannuation amounts in 1997-98? | 20.06.01 |
| TD 1999/27 | Income tax: what are the thresholds and limits for superannuation amounts in 1999-2000? | 20.06.01 |
| TD 2001/19 | Income tax: Interest paid by a company on bearer debentures: for the purposes of paragraph 126(1)(e) of the *Income Tax Assessment Act 1936* does the term 'holder of the debenture' mean the person in possession of the debenture? | 15.08.01 |

**Commissioner of Taxation**
19 December 2001

*Previous draft:*
Not previously issued in draft form

*Related Rulings/Determinations:*
TR 96/List, TR 97/List, TR 98/List, TR 99/List; TR 2000/List

*Subject references:*
- public rulings
- rulings issued in 2001

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