Assets

About this section

The process for obtaining new tax costs for the assets of joining subsidiaries is described briefly in Part B of this Reference Manual.

→ 'Determining asset values', B2-2

This section (C2) provides a more detailed technical introduction to the treatment of assets under consolidation, supported by:

- high-level worked examples covering each step of the entry cost setting
 process (when a consolidated group forms or one or more entities join a
 consolidated group) and the process on exit (when one or more subsidiaries
 leaves a consolidated group), and
- a series of worked examples describing in detail some of the individual calculation steps in the entry and exit cost setting processes.

Section contents

Technical narratives	
Treatment of assets	
Overview of cost setting process on formation and entry (including transitional rules)	C2-1-010
Calculating the entry ACA (step A)	C2-1-020
Allocating the entry ACA (steps B to E)	C2-1-030
Modifications to entry cost setting rules	C2-1-040
Dealing with errors in TCSAs and changes in liabilities when discharged	C2-1-050
Cost setting on exit	C2-1-060
Treatment of special classes of assets	C2-1-070
Linked assets and liabilities	C2-1-310
CGT events arising out of the cost setting rules	C2-1-410
High-level worked examples	
Cost setting on entry	
The cost setting process on entry	C2-2-110
Consolidated group joins another consolidated group	C2-2-120
Linked entities join a consolidated group	C2-2-130
A trust joins a consolidated group	C2-2-140
Partnership – all partners join consolidated group	C2-2-150
Partnership - not all partners join consolidated group	C2-2-155
Cost setting on exit	
The cost setting process on exit	C2-2-210
Worksheets	
Entry ACA worksheet	C2-3-110
Over-depreciation worksheet	C2-3-210

page 1

Worked examples - cost setting on entry General Entry step A (ACA calculation) Calculating the ACA for non-chosen subsidiary partly held by chosen Amount to be used as cost for membership interests (ACA step 1)........... C2-4-220 Determining the amount of a deferred tax liability to be used at ACA Adjustment at ACA step 2 to allow for timing differences between Estimating undistributed, frankable profits accruing to group before Determining undistributed, taxed (frankable) profits accrued to group Pre-joining time rollover from foreign-resident company or a company Adjustment at formation for distributions of profits to head company Entry step B (allocate to retained cost base assets) Tax cost setting amount for retained cost base assets – entitlement to Entry step C (allocate to reset cost base assets) Adjustment for ACA allocation at formation to membership interests in Entry step D (adjust for over-depreciated assets) Reduction for over-depreciated assets (step D) – administrative short Entry step E (adjust for certain revenue-like assets) Limiting the tax cost setting amounts of revenue-like assets (step E) C2-4-710 Pre-CGT assets on entry Pre-CGT status of membership interests in a joining entity - pre-CGT Pre-CGT factor for assets where subsidiary has membership interests in Applying the continuing majority-owned entity test to multi-tiered

Consolidation Reference Manual

C2: Assets

page 2

Worked examples - cost setting on exit Exit step A (ACA calculation) Increase for certain privatised depreciating assets (at exit ACA step 1). C2-5-220 Adjustment for intragroup liabilities owed to a leaving entity on exit (in Pre-CGT assets on exit Pre-CGT membership interests in a leaving entity (with pre-CGT factor Pre-CGT membership interests in a leaving entity – pre-CGT proportion Calculating pre-CGT membership interests in a multiple exit case (with Internally generated assets Continuing majority-owned entity and internally generated assets C2-5-810 Loss integrity measures and general value shifting regime: Effect of Subdivision 165-CC for steps 1 and 2 of the ACA calculation Effect of Subdivision 165-CC where an entity leaves a consolidated Subdivision 165-CD widely held company concession for an eligible tier-1 company that is a head company of a consolidated group or Application of the loss reduction method to consolidated and MEC Worked examples Formation time treatment of assets head company owns from a pre-Pre-formation changeover times – application of Subdivision 165-CC Treatment of assets owned by head company at both formation time and pre-consolidation changeover time (no changeover time at All assets in head company's loss denial pool become assets of

Consolidation Reference Manual

C2: Assets

page 3