


# ***CR 2001/1 - Class Rulings system***

 This cover sheet is provided for information only. It does not form part of *CR 2001/1 - Class Rulings system*

 This document has changed over time. This is a consolidated version of the ruling which was published on *28 February 2001*



## Class Ruling

Income tax: scrip for scrip roll-over:  
exchange of ordinary shares and options  
in Metcash Trading Limited for ordinary  
shares and options in The Newco  
Project X Limited

---

### *Preamble*

*The number, subject heading, **What this Class Ruling is about** (including **Tax law(s)**, **Class of persons** and **Qualifications** sections), **Date of effect**, **Arrangement** and **Ruling** parts of this document are a 'public ruling' in terms of Part IVAAA of the **Taxation Administration Act 1953**. CR 2001/1 explains Class Rulings and 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.*

## Withdrawal

---

1. This Ruling is withdrawn and ceases to have effect after 30 June 2005.

---

**Commissioner of Taxation**  
16 March 2005

---

### *Previous draft:*

Not previously issued as a draft

### *Related Rulings/Determinations:*

TR 92/1; TR 97/16; CR 2001/1

### *Subject references:*

- arrangement
- capital proceeds
- CGT event
- company
- cost base
- interests
- ordinary share
- original interest
- replacement interest
- resident
- roll-over
- roll-over relief

### *- scrip*

- scrip for scrip

- share

- shareholder

- takeover

### *Legislative references:*

- ITAA 1936 6(1)

- ITAA 1997 Subdiv 124-M

- ITAA 1997 124-780(1)(a)(i)

- ITAA 1997 124-780(1)(a)(ii)

- ITAA 1997 124-780(1)(b)

- ITAA 1997 124-780(1)(c)

- ITAA 1997 124-780(2)(a)

- ITAA 1997 124-780(2)(b)

- ITAA 1997 124-780(2)(c)

- ITAA 1997 124-780(3)(a)

- ITAA 1997 124-780(3)(b)

- ITAA 1997 124-780(3)(c)

# CR 2005/11

- ITAA 1997 124-780(3)(d)
  - ITAA 1997 124-780(4)(a)
  - ITAA 1997 124-780(4)(b)
  - ITAA 1997 124-780(5)
  - ITAA 1997 124-795(2)(a)
  - ITAA 1997 124-795(2)(b)
  - ITAA 1997 124-810
  - ITAA 1997 170-260
  - Copyright Act 1968
  - Corporations Act 2001
  - TAA 1953 Pt IVAAA
- 

## ATO references

NO: 2005/3412

ISSN: 1445-2014