


# ***PR 2001/136W - Income tax: Barkworth Olive Groves Project No. 3***

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 This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2002*



## Product Ruling

### Income tax: Barkworth Olive Groves Project No 3

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#### ***Preamble***

*The number, subject heading, and the **What this Product Ruling is about** (including **Tax law(s)**, **Class of persons** and **Qualifications** sections), **Date of effect**, **Withdrawal**, **Arrangement** and **Ruling** parts of this document are a 'public ruling' in terms of Part IVAAA of the **Taxation Administration Act 1953**. Product Ruling PR 1999/95 explains Product 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

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1. This Product Ruling is withdrawn and ceases to have effect after 30 June 2002. The Ruling continues to apply, in respect of the tax law ruled upon, to all persons within the specified class who entered into the specified arrangement between 19 May 1999 and 9 March 2000. Thus, the Ruling continues to apply to those persons, even following its withdrawal, who entered into the specified arrangement as outlined. This is subject to there being no material difference in the arrangement or in the persons' involvement in the arrangement.

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#### **Commissioner of Taxation**

24 October 2001

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#### *Previous draft:*

Not previously issued in draft form

#### *Related Rulings/Determinations:*

PR 1999/27; PR 1999/95; TR 92/1;  
TR 92/20; TR 97/16; TR 98/22;  
TD 93/34,

#### *Subject references:*

- NCL provisions
- non commercial losses
- Commissioner's discretion
- product rulings
- schemes and shams
- tax avoidance

- tax benefits under tax avoidance schemes
- tax shelters
- tax shelters project

#### *Legislative references:*

- TAA 1953 Part IVAAA
- ITAA 1936 82KL
- ITAA 1936 Part IVA
- ITAA 1997 Div 35
- ITAA 1997 35-10
- ITAA 1997 35-10(2)
- ITAA 1997 35-10(3)
- ITAA 1997 35-10(4)
- ITAA 1997 35-30
- ITAA 1997 35-35

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FOI status: **may be released**

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|----------------------|-------------------------|
| - ITAA 1997 35-40    | - ITAA 1997 35-55(1)(a) |
| - ITAA 1997 35-45    | - ITAA 1997 35-55(1)(b) |
| - ITAA 1997 35-55    | - ITAA 1997 35-55(2)    |
| - ITAA 1997 35-55(1) |                         |
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ATO references:

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