

**Notice of Rulings and Withdrawal of Rulings 2 July 2025**

The Commissioner of Taxation, Rob Heferen, gives notice by notifiable instrument under subsection 358-5(4) of Schedule 1 to the *Taxation Administration Act 1953* of the following public rulings, and under subsection 358-20(1) of Schedule 1 to the *Taxation Administration Act 1953* of the withdrawal of the following public rulings, copies of which can be obtained from ato.gov.au/law

|  |  |  |
| --- | --- | --- |
| NOTICE OF RULINGS | | |
| Ruling number | Subject | Brief description |
| CR 2025/43 | Otto Energy Limited – return of capital and dividend | This Ruling sets out the income tax consequences of the return of capital and dividend distribution to shareholders of Otto Energy Limited on 16 June 2025.  This Ruling applies to shareholders specified in the Ruling from 1 July 2024 to 30 June 2025. |
| CR 2025/44 | FAR Ltd – return of capital | This Ruling sets out the income tax consequences for shareholders of FAR Ltd who received a return of capital payment 12 June 2025.  This Ruling applies to shareholders specified in the Ruling from 1 July 2024 to 30 June 2025. |

|  |  |  |
| --- | --- | --- |
| NOTICE OF ADDENDUM | | |
| Ruling number | Subject | Brief description |
| TR 97/7 | Income tax: section 8-1 – meaning of ‘incurred’ – timing of deductions | This addendum amends Taxation Ruling TR 97/7 to clarify when a loss is incurred, and to draw the distinction between losses and outgoings, following the decision in *Bowerman and Commissioner of Taxation* [2023] AATA 3547.  This Addendum applies before and after date of issue. |

|  |  |  |
| --- | --- | --- |
| NOTICE OF WITHDRAWAL | | |
| Ruling number | Subject | Brief description |
| TD 2019/11W | Income tax: what are the reasonable travel and overtime meal allowance expense amounts for the 2019-20 income year? | TD 2019/11 is being withdrawn as its date of effect has ceased. The Determination will continue to be legally binding on the Commissioner for the relevant period to which it relates. |