

Appendix: Template draft ruling

When applying for a ruling, an applicant is required to provide a draft ruling. The following is a simplified version of our ruling template, which can be used by applicants when preparing their application.

PRIVATE/PRODUCT RULING

This is a private/product ruling made under section 91E/91F of the Tax Administration Act 1994.

The Applicant(s)

List name and IRD numbers of applicant(s)

Taxation Law(s)

List the section(s) and statute(s) you want us to rule on.

The Arrangement (Facts) to which this Ruling applies

Set out the relevant facts on which you seek a ruling. Include as much detail as possible. Please provide copies of any documents referred to as part of your application.

Condition(s) stipulated by the Commissioner

List any conditions you think the Commissioner will need to make in order to rule as requested.

How the Taxation Law(s) applies (apply)

Clearly state the outcome(s) that you want the ruling to confirm.

Include a taxation law section reference if possible. For example, you might want us to confirm that:

- An amount of expenditure will be deductible under s DA 1.
- An amount received will not be income under s CB 4.
- A specific transaction is a “financial arrangement” under s EW 3.

The period or income year for which this Ruling applies

Set out the period that you want the ruling to apply for.

Our standard period is three years. If you want a different period, please give your reasons as part of your application.