HMRC - OT21035 - Other Income

Income from Ballast Recovery Oil

Income from ballast recovery oil (income generated as a result of deballasting) is within the ring fence as it is part of the overall activities which comprise the ring fence trade.

This income is not chargeable to PRT.

Income from Oil Rights

The acquisition, enjoyment or exploitation of oil rights as part of a trade is specifically brought within the ring fence by CTA10\S274.

However, while income from the acquisition, enjoyment or exploitation of oil rights may be trading income it can also arise outside of a trade. Thus not all income from oil rights is necessarily trading income. Whether or not it is trading income is a question of fact to be decided after careful consideration of the particular surrounding circumstances.

Previous page

Next page