HMRC - OT21040 - Tariff Receipts And Tax-Exempt Tariffing Receipts

CTA10\S291

Tariff receipts (see OT15000) and tax-exempt tariffing receipts (see OT15800) which would not otherwise be within the ring fence are brought in by CTA10\S291. Tariff receipts and tax-exempt tariffing receipts are considered in detail in the PRT section of this manual.

A few additional notes may be useful.

For income to be within CTA10\S291 it must also be within the charge to PRT. Where this is not so, then tariff receipts and tax-exempt tariffing receipts can still be within the RF if they fall within the various definitions.

Where a company is connected with a participator and receives tariff receipts or tax-exempt tariffing receipts, which for PRT purposes are attributable to the participator, the tariffing activity is within the ring fence. (CTA10\S291(6)).

Where tariff receipts or tax-exempt tariffing receipts are received by a participator in a foreign (e.g. Norwegian) field for UK use of a field asset, these are within PRT and are brought within the ring fence by OTA83\Sch4\Para16.

In certain circumstances where the chargeable field for tariff income for PRT purposes would otherwise change, FA99\S98 deems the recipient to remain or to become a participator in the PRT field (OT15150). The recipient is then also deemed to be a participator in the PRT field for the purposes of CTA10\S291 and other relevant sections.

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