HMRC - TPC60040 - Abandonment

S1216E-S1216EC Corporation Tax Act 2009

If production of a programme ceases before completion, the abandonment effectively takes the place of completion for the purposes of Television Tax Relief (TTR).

The Television Production Company (TPC) can still claim relief for qualifying production expenditure incurred before the programme was abandoned. The abandonment does not in itself affect entitlement to any TTR given in previous periods.

As with a completed programme, this entitlement still depends on whether the programme satisfies the qualifying conditions:

the TPC may present an interim certificate for the final period (since it will not be able to procure a final certificate) (TPC40030). If the programme is still a British programme then entitlement to any TTR already given stands, and

the programme must still satisfy the 25% or 10% (whichever applies) minimum UK core expenditure condition (TPC40040) though now with respect to the actual, rather than planned, level of expenditure. If the bulk of the core UK expenditure was planned to fall later in production, after the point at which the programme was abandoned this condition may not be satisfied.

The ‘intended for broadcast’ condition (TPC40020) does not specifically address abandonment. Strictly, once production of a programme is abandoned, it cannot any longer be intended for broadcast. However, in such circumstances, a programme will be deemed to meet the condition if it would have met it immediately before abandonment.

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