

# Public Guidance work programme 2025-26

As at 1 October 2025

This section of the work programme summarises all our Public Guidance projects based on their current progress status, with a hyperlink to further information on each item in the more detailed table that follows. New additions to the work programme for 2025-26 are shaded in taupe. Progress on existing projects since the work programme was last updated are shown in bold. Items completed since 1 July 2025 are shaded in light blue at the end of the summary, with links to published items in the more detailed table.

Project no.	Title	Focus of tax issue						Need for item		
		Company	Trust	Individual	Land	Inter-national	Charities	Technical uncertainty	Compliance / education	Refresh / update
Items where public consultation has closed										
<a href="#">PUB00493</a>	GST and Income tax – Emissions Trading Scheme issues for emitters and removal activities	✓	✓	✓				✓	✓	
<a href="#">PUB00519</a>	Income tax – Land – Application of s CB 3 (Profit-making undertaking or scheme) to land disposals	✓	✓	✓	✓			✓		
<a href="#">PUB00484</a>	Tax administration – Care and management duty – Review of IS 10/07							✓		✓
<a href="#">PUB00520</a>	GST – Meaning of “payment”	✓	✓	✓	✓		✓	✓	✓	✓
<a href="#">PUB00514</a>	GST – Secondhand goods	✓	✓	✓	✓		✓	✓	✓	✓
<a href="#">PUB00476</a>	GST – Taxable activity	✓	✓	✓					✓	✓
<a href="#">PUB00478</a>	Income tax – Business activity	✓	✓	✓			✓			✓
<a href="#">PUB00491</a>	Income tax – End of lease of farmland – expenditure on horticultural plants	✓	✓	✓	✓			✓		
<a href="#">PUB00521</a>	Income tax – Loss carry-forward – public private partnership projects and business continuity	✓						✓		
<a href="#">PUB00492</a>	Income tax – Purchase price allocation rules and disposal of land improvements and listed horticultural plants	✓	✓	✓	✓			✓		
Items currently at public consultation										
<a href="#">PUB00500</a>	Tax administration – Shortfall penalties – Gross carelessness (closes 31 October 2025)	✓	✓	✓				✓	✓	✓
<a href="#">PUB00498</a>	Tax administration – Shortfall penalties – Not taking reasonable care (closes 31 October 2025)	✓	✓	✓				✓	✓	✓
<a href="#">PUB00499</a>	Tax administration – Shortfall penalties – Unacceptable tax position (closes 31 October 2025)	✓	✓	✓				✓	✓	✓
<a href="#">PUB00509</a>	Income tax – Deductibility of sponsorship expenditure – updating IS3229 (closes 21 November 2025)	✓	✓					✓	✓	✓
Items we expect to send to public consultation next										
<a href="#">PUB00507</a>	FBT – Exemption for benefits related to health or safety	✓						✓	✓	
<a href="#">PUB00515</a>	GST – Supplies by payment service providers to merchants	✓						✓	✓	

Project no.	Title	Focus of tax issue						Need for item		
		Company	Trust	Individual	Land	Inter-national	Charities	Technical uncertainty	Compliance / education	Refresh / update
<a href="#">PUB00518</a>	Income tax – Cryptoassets used in decentralised finance transactions and other issues (Issues Paper)	✓	✓	✓				✓	✓	
<a href="#">PUB00510</a>	Income tax – Deductibility of asbestos removal costs	✓	✓	✓				✓	✓	
<a href="#">PUB00505</a>	Income tax – Repairs and maintenance – refresh of IS 12/03	✓	✓	✓					✓	✓
<a href="#">PUB00501</a>	Tax administration – Shortfall penalties – Abusive tax position	✓	✓	✓				✓	✓	✓
<a href="#">PUB00502</a>	Tax administration – Shortfall penalties – Evasion	✓	✓	✓				✓	✓	✓
<a href="#">PUB00513</a>	Working for families – family scheme income			✓				✓	✓	
<b>Items currently in progress</b>										
<a href="#">PUB00463</a>	GST – Brokering and promoting of financial products by intermediaries	✓						✓	✓	✓
<a href="#">PUB00525</a>	GST – Compulsory zero-rating of land – update of IS 17/08	✓	✓	✓	✓					✓
<a href="#">PUB00526</a>	GST – Concurrent land use	✓	✓	✓	✓			✓		
<a href="#">PUB00516</a>	GST – Court awarded costs and disbursements	✓	✓	✓				✓	✓	
<a href="#">PUB00545</a>	<b>GST – Fees of board members appointed by the Governor-General or Governor-General in Council</b>	✓		✓						✓
<a href="#">PUB00522</a>	GST – Financial services - management of a retirement scheme	✓						✓	✓	
<a href="#">PUB00412</a>	GST – Foster care payments			✓					✓	✓
<a href="#">PUB00413</a>	GST – Not-for-profit bodies – Supplies of donated goods and services (PIB)						✓	✓	✓	✓
<a href="#">PUB00511</a>	GST – Reduced rate of GST for residential accommodation	✓	✓	✓				✓	✓	
<a href="#">PUB00468</a>	GST – Supplies to vessels temporarily in/visiting New Zealand	✓		✓				✓	✓	
<a href="#">PUB00530</a>	GST – Types of unincorporated bodies			✓	✓			✓	✓	
<a href="#">PUB00509</a>	Income tax – Deductibility of sponsorship expenditure – updating IS3229	✓	✓					✓	✓	✓
<a href="#">PUB00543</a>	Income tax – FIFs – whether cost and CV methods can be used concurrently		✓	✓		✓		✓	✓	
<a href="#">PUB00506</a>	Income tax – Forestry issues	✓	✓	✓				✓	✓	
<a href="#">PUB00534</a>	Income tax – intra-group dividends – s CD 27	✓						✓		
<a href="#">PUB00503</a>	Income tax – Land – Property held for resale: Tax treatment of costs of land development and other expenses (PIB)	✓	✓	✓	✓			✓	✓	✓
<a href="#">PUB00535</a>	Income tax – losses – business continuity and part year losses	✓						✓		
<a href="#">PUB00512</a>	Income tax – Māori authorities	✓	✓	✓				✓	✓	
<a href="#">PUB00266</a>	Income tax – Payments derived from New Zealand by non-resident software suppliers	✓	✓	✓		✓		✓		
<a href="#">PUB00508</a>	Income tax – PIE income from land activities	✓	✓		✓			✓		
<a href="#">PUB00537</a>	Income tax – retention money and performance bonds under construction contracts – update of QB 13/04	✓			✓					✓
<a href="#">PUB00541</a>	Income tax – Trusts – interest deductibility		✓					✓	✓	
<a href="#">PUB00544</a>	<b>Income tax - When is a trustee a bare trustee</b>		✓	✓	✓			✓	✓	
<a href="#">PUB00523</a>	Income tax and GST – Associated persons	✓	✓	✓	✓		✓		✓	
<b>Items not currently being worked on</b>										
<a href="#">PUB00524</a>	GST – B2B loyalty schemes	✓						✓	✓	
<a href="#">PUB00527</a>	GST – financial services – custodian, supervisor and trustee fees	✓	✓					✓		

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<a href="#">PUB00528</a>	GST – financial services – planning fees – refresh of IS0052	✓	✓	✓				✓		✓
<a href="#">PUB00529</a>	GST – goods and services acquired for \$10,000 or less	✓	✓	✓			✓	✓	✓	
<a href="#">PUB00531</a>	Income tax – B2B loyalty schemes	✓						✓	✓	
<a href="#">PUB00532</a>	Income tax – deductions – financial planning fees – refresh of IS0044	✓	✓	✓			✓			✓
<a href="#">PUB00533</a>	Income tax – depreciation – low value assets	✓	✓	✓					✓	
<a href="#">PUB00536</a>	Income tax – NZ custodians’ ‘top-up’ amount of RWT	✓	✓			✓			✓	
<a href="#">PUB00538</a>	Income tax – schedular payments – withholding obligations under Sch 4, Part F	✓	✓	✓			✓		✓	
<a href="#">PUB00539</a>	Income tax – share lending issues			✓				✓	✓	
<a href="#">PUB00540</a>	Income tax – transferable development rights	✓	✓		✓			✓		
<b>Items on hold</b>										
<a href="#">PUB00436</a>	GST – Disposal of an interest in a joint venture involving land				✓			✓	✓	
<a href="#">PUB00356</a>	GST – Input tax – Registered members of unregistered unincorporated bodies	✓	✓					✓	✓	
<a href="#">PUB00475</a>	GST – Liquidations	✓						✓	✓	
<a href="#">PUB00477</a>	GST – Short-stay accommodation – updating IS 20/04	✓	✓	✓	✓					✓
<a href="#">PUB00490</a>	GST – Supplies of residences and other real property – updating IS 20/05	✓	✓	✓	✓					✓
<a href="#">PUB00504</a>	Income tax – Cash incentives for banking customers	✓	✓	✓	✓			✓	✓	
<a href="#">PUB00467</a>	Income tax – Flood damage repairs	✓	✓	✓	✓			✓	✓	
<a href="#">PUB00470</a>	Income tax – Payments by an employer on death of an employee	✓		✓				✓	✓	
<b>Items published or closed since 1 July 2025</b>										
<a href="#">PUB00485</a>	GST – Forfeited deposits from cancelled land sale agreements	✓	✓	✓	✓			✓		✓
<a href="#">PUB00496</a>	GST – Platform economy rules (2 items)	✓	✓	✓					✓	
<a href="#">PUB00494</a>	Income tax – Distributions from foreign trusts – refresh of IS 19/04			✓				✓	✓	✓
<a href="#">PUB00459</a>	Income tax – Land – Deductibility of initial repairs	✓	✓	✓	✓				✓	
<a href="#">PUB00469</a>	Income tax – Returns of capital and dividends in lieu – Refresh of IS2966	✓						✓		✓
<a href="#">PUB00497</a>	Student loans – Determining residency of overseas borrowers			✓				✓	✓	

## Detailed work programme

This table contains more information about each item on the work programme including a short explanation of what the item is about, the reason for the item and how the item is progressing. Completed items are shaded light blue. Items currently on hold and not being actively worked on are shaded grey and include a brief explanation of why progress has paused. New additions to the work programme for 2025-26 are shaded in taupe. Progress on existing projects since the work programme was last updated are shown in bold.

Project no.	Title	What this item is about	Why are we doing this item	Comments
PUB00507	FBT – Exemption for benefits related to health or safety	This item will consider the breadth of the exemption from FBT in s CX 24 of the ITA 2007 for benefits that an employer provides to an employee related to the employee's health or safety.	The CIR is aware of some uncertainty about the breadth of this exemption, and it will be useful to clarify when and how the provision applies.	Considering issues.
PUB00524	GST – B2B loyalty schemes	This item will consider the GST treatment of business-to-business loyalty schemes (including trade rebates and business-to-business loyalty points schemes).	We are aware of uncertainty and inconsistency in the GST treatment of these business-to-business schemes.	Not started.
PUB00463	GST – Brokering and promoting of financial products by intermediaries	This item will provide guidance on the GST treatment where banks or other intermediaries broker or promote financial products offered by different parties to their customers.	With more regulation and evolving technologies, intermediaries are using different arrangements and providing varying levels of services when offering financial products to customers. Guidance and examples will be helpful when considering the GST treatment of these various brokering, promotional or partnering arrangements.	Considering issues.
PUB00525	GST – compulsory zero-rating of land – update of IS 17/08	This project will update <a href="#">IS 17/08</a> in light of legislative changes, particularly changes to s 5(23).	Legislative changes to the compulsory zero-rating rules for land, particularly s 5(23) mean the guidance in IS 17/08 could be misleading for some customers.	Scoping.
PUB00526	GST – concurrent land use	This item will provide guidance on some common scenarios explaining when section 21E (concurrent use of land) applies and when section 21FB (permanent change of use, in this case from taxable to exempt) applies to property developers who rent	We are aware that this is a difficult area for developers and that guidance will be helpful.	Scoping.

Project no.	Title	What this item is about	Why are we doing this item	Comments
		out residential properties while waiting for the market to improve so they can sell.		
PUB00516	GST – Court awarded costs and disbursements	This item will address the GST treatment of court awarded costs and disbursements, and will consider when s 20A of the GSTA may apply to such amounts.	A need for guidance on this issue was identified when preparing <a href="#">IS 23/07</a> GST – Court awards and out-of-court settlements.	Considering issues.
PUB00436	GST – Disposal of an interest in a joint venture involving land	This item will address the GST treatment of the disposal of an interest in a land-owning joint venture, and whether it is a disposal of an interest in land for GST purposes.	Clarification is needed on the application of the GST rules to such disposals.	On hold for Policy consideration of submissions on <a href="#">GST and unincorporated joint ventures</a> .
<b>PUB00545</b>	<b>GST - fees of board members appointed by the Governor-General or Governor-General in Council</b>	<b>This project will update BR Pub 23/03 for a recent legislative amendment to s 6(4) of the GST Act</b>	<b>Changes to s 6(4) of the GST Act mean BR Pub 23/03 needs updating. For consistency this will involve also re-issuing BR Pub 23/01 and BR Pub 23/02 as they share the same commentary.</b>	<b>Not started.</b>
PUB00527	GST – financial services – custodian, supervisor and trustee fees	This item will consider the GST treatment of specific financial service fees - custodian fees, supervisor and trustee fees – and whether they qualify as exempt supplies.	Following the publication of guidance on fees paid in relation to managed funds in <a href="#">IS 25/05</a> , the CIR was asked to provide further guidance on some specific types of financial services fees received by custodians, supervisors and trustees.	Not started.
PUB00522	GST – Financial services - management of a retirement scheme	This item will consider the meaning of the phrase “management of a retirement scheme” in s 3(1)(j) of the GST Act when determining what services are “financial services”.	The CIR is aware of uncertainty about the scope of the phrase “management of a retirement scheme” and whether it extends to outsourced services provided by third parties.	Considering issues.

Project no.	Title	What this item is about	Why are we doing this item	Comments
PUB00528	GST – financial services – planning fees – refresh of IS0052	This project will refresh interpretation statement <a href="#">IS0052</a> on the GST treatment of services provided by financial advisers to plan, implement, and monitor an investment portfolio for their investor clients.	It is close to 25 years since IS0052 was published and in light of the recent publications for managed fund fees it seems timely to also refresh this guidance for financial advisers.	Not started.
PUB00485	GST – Forfeited deposits from cancelled land sale agreements	This item will refresh a QB published in May 2005 on the <a href="#">GST consequences of a cancelled contract</a> .	With the publication of <a href="#">QB 23/09</a> on the income tax treatment of forfeited deposits from cancelled land sale agreements, it is appropriate to update the 2005 public item QB to ensure consistency in the guidance.	Published on 15 July 2025 as <a href="#">QB 25/18</a> .
PUB00412	GST – Foster care payments	This item will address the GST treatment of payments made by the government to foster carers in respect of the cost of fostering a child.	This item arises from the PIB review. (PIB 179-07 - GST on payments from the Department of Social Welfare to foster parents and organisations concerned with child welfare). Clarification continues to be needed.	<b>Considering issues.</b>
PUB00529	GST – goods and services acquired for \$10,000 or less	This item will consider how the provisions relating to goods and services acquired for \$10,000 or less apply. This includes considering how the apportionment rules apply, and how the adjustment rules apply (including the rules for goods and services acquired before GST registration).	The CIR is aware of uncertainty about how the low value threshold applies.	<b>Scoped.</b>
PUB00356	GST – Input tax – Registered members of unregistered unincorporated bodies	This item will address whether GST-registered members of unincorporated bodies can claim their share of any GST input tax paid by the body when the body itself is not GST registered because it falls below the GST registration threshold.	We understand there is uncertainty of treatment for members of unincorporated bodies.	On hold for Policy consideration of submissions on <a href="#">GST and unincorporated joint ventures</a> .
PUB00475	GST – Liquidations	This item will address common GST issues that arise on the liquidation of a company. In addition to issues identified by Inland Revenue we will be seeking suggestions from our external stakeholders on issues they would like to see addressed.	It has been identified that Inland Revenue and our customers would benefit from some general guidance on liquidations.	On hold pending discussions with Policy.

Project no.	Title	What this item is about	Why are we doing this item	Comments
PUB00520	GST – Meaning of “payment”	This item will refresh the Commissioner’s 1994 guidance on when there is ‘payment’ for GST purposes.	This project has arisen out of the scoping work done for <a href="#">PUB00514</a> . PUB00514 will refresh the Commissioner’s 1994 guidance on GST claims for secondhand goods on property transactions between associated persons. Included in the 1994 guidance is some guidance on the question of when there is ‘payment’. This is an important GST issue (and broader than just secondhand goods).	<b>Public consultation closed on 10 September 2025. Considering submissions.</b>
PUB00413	GST – Not-for-profit bodies – Supplies of donated goods and services	PIB 164-18 - GST - supply of donated goods and services by a non-profit body.	This item arises from the PIB review. The PIB item concerns an historic administrative position where a non-profit body sells donated goods or services that include less than 5 percent of purchased goods. In that case the supply is treated as still exempt. Clarification continues to be needed.	Considering issues.
PUB00496	GST – Platform economy rules	This item will provide greater certainty around the scope of the new platform economy rules including the meaning of "listed services" and "market place operator".	The CIR is aware of some uncertainty about the breadth of the new platform economy rules and will seek to provide greater certainty as the new rules bed down.	Published on 28 July 2025 as <a href="#">QB 25/19</a> and <a href="#">QB 25/20</a>
PUB00511	GST – Reduced rate of GST for residential accommodation	This item will consider and update guidance on s 10(6) of the GSTA. This provision provides for a reduced rate of GST where a supply comprises domestic goods and services in a commercial dwelling generally for a period in excess of 4 weeks.	The CIR is aware of cases where s 10(6) has been misapplied. Further guidance in this area will be useful to clarify when and how the provision applies.	Considering issues.
PUB00514	GST – Secondhand goods	This item will refresh the Commissioner’s 1994 guidance on GST claims for secondhand goods on property transactions between associated persons and will consider what goods comprise “secondhand goods” for GST purposes and when there is ‘payment’ for the supply.	It is appropriate for the existing guidance to be updated to reflect current commercial practices and to re-clarify for customers the requirements for a valid secondhand goods claim.	<b>Public consultation closed on 10 September 2025. Considering submissions.</b>

Project no.	Title	What this item is about	Why are we doing this item	Comments
PUB00477	GST – Short-stay accommodation – updating IS 20/04	This project will look at <a href="#">IS 20/04</a> : GST treatment of short-stay accommodation to identify what updating is required following the 2023 changes to the GST apportionment and adjustment rules.	This project is needed to ensure existing public guidance is accurate given the changes to the GST apportionment and adjustment rules in the Taxation (Annual Rates for 2022–23, Platform Economy, and Remedial Matters) Act 2023.	On hold pending Policy consideration.
PUB00515	GST – Supplies by payment service providers to merchants	This project will address the GST treatment of supplies of payment processing facilities to merchants which the merchant pays a 'merchant service fee' to the provider.	It appears there is some industry uncertainty and inconsistency in the GST treatment of these facilities, and so this project will clarify the correct GST treatment for both providers and merchants.	Considering issues.
PUB00490	GST – Supplies of residences and other real property – updating IS 20/05	This project will look at <a href="#">IS 20/05</a> : GST - Supplies of residences and other real property to identify what updating is required following the 2023 changes to the GST apportionment and adjustment rules.	This project is needed to ensure existing public guidance is accurate given the changes to the GST apportionment and adjustment rules in the Taxation (Annual Rates for 2022–23, Platform Economy, and Remedial Matters) Act 2023.	On hold pending Policy consideration.
PUB00468	GST – Supplies to vessels temporarily in/visiting New Zealand	This item will consider how the GST rules apply to supplies made to vessels temporarily in/visiting New Zealand.	This item will update earlier guidance and address some perennial issues for Temporary Import Entry vessels, vessels exempt from entry and berthage supplies made to vessels. It will support NZ Customs with the application of the GST rules.	Considering issues.
PUB00476	GST – Taxable activity	Understanding whether a person is carrying on a taxable activity and when that activity begins is a fundamental GST issue. This project intends to provide general guidance and examples on the requirements for a taxable activity and how to identify when a taxable activity begins and ends.	While previously we have provided guidance on taxable activities for GST the guidance is piecemeal and the many ways of doing business is changing. The purpose of this item is to bring our existing analysis together in a refreshed, relevant and accessible item.	<b>Public re-consultation closed on 8 September 2025. Considering submissions.</b>



Project no.	Title	What this item is about	Why are we doing this item	Comments
PUB00530	GST – types of unincorporated bodies	These interpretation guidelines will clarify the difference between co-ownership, cost sharing arrangements, joint ventures, partnerships and other unincorporated bodies so taxpayers can determine the correct GST treatment.	It is hoped that clarification of the legal nature of the different types of unincorporated bodies will help customers better understand their position when applying the GST rules to their situation.	<b>Considering issues.</b>
PUB00493	GST and Income tax – Emissions Trading Scheme tax issues for emitters and removal activities	This item will provide general guidance on the income tax and GST consequences of the emissions trading scheme for emitters and removal activities. It will address the deductibility of emissions liabilities and the tax treatment of ETS units.	There is no general guidance on the tax treatment of the emissions trading scheme. This project is related to <a href="#">PUB00452</a> .	Public consultation closed 27 February 2025. Considering submissions.
PUB00531	Income tax – B2B loyalty schemes	This item will consider the income tax treatment of business-to-business loyalty schemes (including business-to-business loyalty points schemes).	We are aware of uncertainty and inconsistency in the tax treatment of these business-to-business schemes.	Not started.
PUB00478	Income tax – Business activity	Understanding when a person is carrying on a business is fundamental to income tax. While the case law is settled the context in which we carry on business continues to change. This project intends to provide general guidance and examples on the requirements for a business and how to identify when a business begins and ends.	It is some time since we have provided guidance on the business test for income tax purposes. Our existing guidance is piecemeal and our ways of doing business are evolving. The purpose of this item is to bring our existing analysis together in a refreshed, relevant and accessible item.	<b>Public consultation closed on 5 September 2025. Considering submissions.</b>
PUB00504	Income tax – Cash incentives for banking customers	Some banks offer 'cash back' payments to customers when they borrow to purchase residential rental properties or for their businesses. This item will consider the income tax treatment of such amounts.	We are aware some customers are uncertain about the correct tax treatment of cash back amounts. This project will provide guidance on the correct tax treatment in various situations depending on the personal circumstances of the customer.	On hold pending Policy consideration.
PUB00518	Income Tax – Cryptoassets used in decentralised finance transactions and other issues	This item will clarify some issues that arise for taxpayers who undertake defi transactions, such as when there is a disposal of cryptoassets for tax purposes.	There are an increasing number of cryptoasset holders undertaking defi transactions and some uncertainty about how the transactions are treated for tax purposes.	Considering issues.
PUB00510	Income tax – Deductibility of asbestos removal costs	This item will consider the deductibility of the cost of removing asbestos. It will	The CIR is aware of cases involving the removal of asbestos and a lack of public	Considering issues.

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		include consideration of the relevance of s DB 46 (Avoiding, remedying, or mitigating effects of discharge of contaminant or making of noise) of the ITA 2007.	guidance on the issues. This is an opportunity to consult on IR's position.	
PUB00509	Income tax – Deductibility of sponsorship expenditure – updating IS3229	In light of the new rules for donations of trading stock in s GC 1 of the ITA 2007 this item will revisit <a href="#">IS3229</a> : Deductibility of sponsorship expenditure including considering the concept of "corporate social responsibility".	The recent changes to s GC 1 (Disposals of trading stock or similar property) have brought into question the parameters of deductibility for gifting in the corporate environment. As these situations often cross over with the concepts of sponsorship it is considered timely to revisit IS3229.	<b>At public consultation until 21 November 2025.</b>
PUB00532	Income tax – deductions – financial planning fees – refresh of IS0044	This project will review interpretation statement <a href="#">IS0044</a> on the deductibility of a range of financial planning fees charged to different types of investors.	It is 25 years since IS0044 was published and given developments in financial products it seems timely to update this guidance for financial advisers.	Not started.
PUB00533	Income tax – depreciation – low value assets	This item will explain when taxpayers can apply the 100% depreciation rate for low value assets under s EE 38 and the conditions that need to be satisfied.	The CIR is aware of a need for guidance for taxpayers to understand how the rules in s EE 38 apply and the conditions that need to be satisfied.	Not started.
PUB00494	Income tax – Distributions from foreign trusts – refresh of IS 19/04	The existing statement <a href="#">IS 19/04</a> considers the income tax treatment of amounts of money or property transferred to New Zealand resident taxpayers by a person overseas and whether such amounts are either beneficiary income or a taxable distribution from a foreign trust.	This item will refresh the guidance published in IS 19/04 so it is up to date. Updating this item was identified during work on <a href="#">IS 24/01</a> Taxation of trusts.	Published on 7 August 2025 as <a href="#">IS 25/18</a> .
PUB00491	Income tax – End of lease of farmland – expenditure on horticultural plants	This item considers the tax treatment of expenditure a farmer incurs on planting non-listed horticultural plants or listed horticulture plants on leased land, when the lease ends.	This item arose out of work done for <a href="#">PUB00467</a> on flood damage repairs.	<b>Public consultation closed on 15 September 2025. Considering submissions.</b>
PUB00543	Income Tax – FIFs – whether cost and CV methods can be used concurrently	This project will consider whether a natural person or trustee of a family trust with attributing interests in two separate FIFs, can use the CV method for one interest (eg, listed investments), and the cost method for	There appears to be considerable uncertainty about this issue so clarification will be helpful.	Considering issues.

Project no.	Title	What this item is about	Why are we doing this item	Comments
		the other interest (eg, unlisted investments), in the same income year.		
PUB00467	Income tax – Flood damage repairs	This item will address the tax treatment of repairs made by businesses to rectify flood damage to their land and other property.	In the wake of recent adverse weather events, urgent guidance is needed to assist flood affected businesses to understand the tax treatment of repairs.	On hold pending Policy consideration. See R&R-922 on Policy Remedials Log.
PUB00506	Income Tax – Forestry issues	This item will consider how the ITA 2007 applies to forestry, including the timing of deductions and the spreading of income.	Forestry investment is a growth area. However, there is a lack of guidance about how the forestry rules in the ITA 2007 operate.	<b>Scoped.</b>
PUB00534	Income tax – intra-group dividends – s CD 27	This item will provide general guidance on the dividend exclusion rules for downward intra-group dividends and will include some examples of transactions.	We have been asked to provide practical guidance on s CD 27 along with some examples of transactions illustrating the operation of the exclusion.	<b>Scoping.</b>
PUB00519	Income tax – Land – Application of s CB 3 (Profit-making undertaking or scheme) to land disposals	This project will consider whether s CB 3 can apply to amounts derived from the disposal of land as part of a profit-making undertaking or scheme.	We are aware of uncertainty regarding the scope of s CB 3 and whether amounts derived from the disposal of land are subject to tax only if one of the land sales rules apply.	Public consultation closed on 14 February 2025. Considering submissions.
PUB00459	Income tax – Land – Deductibility of initial repairs	This item will explain the treatment of initial repairs made following the purchase of a dilapidated building.	There seems to be some confusion around the deductibility of dilapidation repairs. The matter is addressed in <a href="#">IS 12/03</a> but it seems further education is needed.	Published on 14 July 2025 as <a href="#">QB 25/17</a> .
PUB00503	Income tax – Land – Property held for resale: Tax treatment of costs of land development and other expenses (PIB)	This item will review PIB 179 (1989): “Property held for resale: Tax treatment of costs of land development and other expenses”.	This is one of the few remaining outstanding items from the <a href="#">PIB Review</a> project started in 2011. Submissions received during the preparation of <a href="#">IS 23/10</a> Deductibility of holding costs for land suggest the accounting treatment of such costs may have an impact on ‘cost’ for tax purposes.	Considering issues.

Project no.	Title	What this item is about	Why are we doing this item	Comments
PUB00521	Income tax – Loss carry-forward – Public private partnership projects and business continuity	This item will address whether a “major change” in a PPP contractor’s business activities occurs during a standard PPP project for the purpose of carrying forward losses under the business continuity test.	The Commissioner thinks it will be useful to provide more certainty about the application of the business continuity test over the duration of standard PPP projects.	<b>Public consultation closed on 19 September 2025. Considering submissions.</b>
PUB00535	Income tax – losses – business continuity and part year losses	This item will explain when part year losses can be carried forward where owner continuity is breached but business continuity is maintained.	We understand this is a complicated area for customers to navigate and guidance will be helpful.	Scoping.
PUB00512	Income tax – Māori authorities	This item will consider the income tax treatment of Māori authorities under subpart HF of the ITA 2007 and will refresh the guidance published in 2003 when the rules were first introduced.	The Māori authorities rules have been in place for over 20 years and so it seems timely to revisit our guidance and refresh it for developments that have occurred over the years.	<b>Considering issues.</b>
PUB00536	Income tax – NZ custodians’ ‘top-up’ amount of RWT	This item will clarify the amount of New Zealand resident withholding tax a custodian who holds foreign shares on behalf of a New Zealand investor needs to withhold.	Sometimes the incorrect amount of foreign tax has been withheld from payments custodians receive for clients. We are aware of uncertainty and inconsistency in the payment of resident withholding tax by custodians in this situation.	Not started.
PUB00470	Income tax – Payments by an employer on death of an employee	When an employee dies employers will often make a payment to assist the family of the deceased employee. Sometimes the payment might be made under the employment agreement to the deceased’s estate and other times it may be a discretionary payment made by the employer to the family or a funeral home. This item will consider the tax treatment of such payments.	Periodically Inland Revenue is asked for advice on this issue and given that advice is usually sought at a difficult time for the employer and families, it seems appropriate to publish some public guidance on the tax treatment of such payments.	On hold pending Policy consideration.
PUB00266	Income tax – Payments derived from New Zealand by non-resident software suppliers	This item will clarify the income tax treatment (under NZ domestic law and double tax agreements) of payments derived from NZ by non-resident suppliers of computer software. More specifically:	It has been suggested both internally and by external practitioners that <a href="#">IG0007</a> is out of date, particularly in light of technological developments in the way software is transacted.	Considering issues.

Project no.	Title	What this item is about	Why are we doing this item	Comments
		<ul style="list-style-type: none"> <li>the proper character of payments for supplies of computer software (whether payments are royalties, business or rental income, for services, or non-taxable receipts); and</li> <li>the possible income tax treatment of each type of payment (including for NRWT).</li> </ul>		
PUB00508	Income tax – PIE income from land activities	This item will consider whether eligible PIE income includes income from activities of developing or dividing land or erecting buildings on land for sale.	There is some uncertainty around whether income from these land activities can be eligible PIE income under s HM 12.	Considering issues.
PUB00492	Income tax – Purchase price allocation rules and disposal of land improvements and listed horticultural plants	This item considers the tax treatment of expenditure a farmer incurs on land improvements described in schedule 20, part A, and on listed horticultural plants, when the farmer sells their business.	This item arose out of work done for <a href="#">PUB00467</a> on flood damage repairs.	<b>Public consultation closed 15 September 2025. Considering submissions.</b>
PUB00505	Income tax – Repairs and maintenance expenditure – refresh of IS 12/03	This item will refresh <a href="#">IS 12/03</a> : Income tax - deductibility of repairs and maintenance expenditure - general principles. The new item will include new practical examples and look to improve the structure and readability of the current Item.	Since its publication in 2012 there have been developments relevant to the deductibility of repairs and maintenance expenditure and it is timely to consider these and current issues taxpayers are experiencing in this area.	Considering issues.
PUB00537	Income tax – retention money and performance bonds under construction contracts – update of QB 13/04	This project will review and update <a href="#">QB 13/04</a> which explains when retention payments are derived and incurred under construction contracts.	Legal developments in this area mean it is sensible to review and update the existing guidance to ensure it continues to be correct and helpful for those in the construction industry.	<b>Scoping.</b>
PUB00469	Income tax – Returns of capital and dividends in lieu – Refresh of IS2966	This item will refresh <a href="#">IS2966</a> : Exclusion from the term "Dividends" – whether distribution made in lieu of dividends' payment which is about the factors to be taken into account in determining whether an acquisition, redemption, or cancellation of shares is made in lieu of the payment of dividends. The new item will include updated	While IS2966 dates back to 1999 and still refers to the Income Tax Act 1994, its analysis remains useful and it continues to be referred to by customers. It will be helpful to update the item.	<b>Published as <a href="#">IS 25/19</a> on 11 September 2025.</b>

Project no.	Title	What this item is about	Why are we doing this item	Comments
		legislative references as well as more practical examples.		
PUB00538	Income tax – schedular payments – withholding obligations under Sch 4, Part F	This item will provide guidance on the schedular payments rules and a payer's obligations under Sch 4, Part F to withhold tax on payments for activities related to sports, media, entertainment and public speaking.	The CIR is aware of some uncertainty among both payers and recipients about the types of payments subject to withholding tax. Guidance and examples will be helpful for both payers and recipients to understand the treatment of these types of payments.	Not started.
PUB00539	Income tax – share lending issues	This project will consider how share lending rules apply (generally, and in relation to FIFs).	The CIR is aware of an absence of guidance for investors on how to apply the share lending rules, and as share lending increases it is appropriate to provide some guidance.	Not started.
PUB00540	Income tax – transferable development rights	This item will consider the income tax treatment of transferable development rights, including the deductibility of any fees incurred by the recipient to acquire them and costs relating to their creation by the donor and the tax treatment for both donor and recipient when they are transferred.	The CIR is aware of an absence of guidance for developers on how to apply the tax rules to these transferable rights.	Not started.
PUB00541	Income tax – trusts – interest deductibility	This project will consider guidance on the deductibility of interest incurred by trustees in various situations.	We are aware there is uncertainty on the deductibility of interest by trustees in some situations and we have been asked to provide guidance.	<b>Scoping.</b>
PUB00544	<b>Income Tax - when is a trustee a bare trustee</b>	<b>This project will consider when a trustee is a bare trustee and so may be a nominee under s YB 21(2). This is especially relevant in relation to borrowings and property holdings in family and close relationship situations.</b>	<b>We are aware that there continues to be uncertainty about when a trustee is a bare trustee. This project will clarify statements made in IS 23/02: Income tax – Application of the s CZ 39 5 year bright-line test to certain family and close relationship transactions.</b>	<b>Considering issues.</b>

Project no.	Title	What this item is about	Why are we doing this item	Comments
PUB00523	Income tax and GST – associated persons	This will be a general item explaining the associated persons definitions for income tax and GST. It will include guidance on the aggregation and tripartite tests, as well as blood relations.	The associated persons definitions can be complex and are relevant for many different provisions in the Income Tax Act and in the GST Act. It will be helpful for customers to have detailed and comprehensive guidance on the definitions in a single resource.	<b>Scoping.</b>
PUB00497	Student loans – Determining residency of overseas borrowers	This project will address residency issues for overseas-based student loan borrowers.	Some borrowers have limited understanding of the residency rules so this guidance is intended to help them determine their residency so they can be clear about their obligations.	<b>Published on 15 September 2025 as <a href="#">IS 25/20</a>.</b>
PUB00484	Tax administration – Care and management duty – Review of IS 10/07	This project will refresh <a href="#">IS 10/07</a> : Care and management of the taxes covered by the Inland Revenue Acts to improve its readability and will also consider whether any updating is required, particularly in light of experiences during the COVID-19 response.	IS 10/07 explains the Commissioner's duty in the care and management of taxes. It is important to ensure it is reviewed from time to time, and especially to consider its effectiveness and relevance in the face of a major event like the COVID-19 pandemic.	Public consultation closed on 26 May 2025. Considering submissions.
PUB00501	Tax administration – Shortfall penalties – Abusive tax position	This project will review and update <a href="#">IS0061</a> on the abusive tax position shortfall penalty.	Shortfall penalties are an integral part of IR's compliance and penalties regime. Therefore, having clear and up-to-date guidance on the application of those penalties is important.	Considering issues.
PUB00502	Tax administration – Shortfall penalties – Evasion	This project will review and update <a href="#">IS0062</a> on the evasion shortfall penalty.	Shortfall penalties are an integral part of IR's compliance and penalties regime. Therefore, having clear and up-to-date guidance on the application of those penalties is important.	Considering issues.
PUB00500	Tax administration – Shortfall penalties – Gross carelessness	This project will review and update <a href="#">IS0060</a> on the gross carelessness shortfall penalty.	Shortfall penalties are an integral part of IR's compliance and penalties regime. Therefore, having clear and up-to-date guidance on the application of those penalties is important.	<b>At public consultation until 31 October 2025.</b>

Project no.	Title	What this item is about	Why are we doing this item	Comments
PUB00498	Tax administration – Shortfall penalties – Not taking reasonable care	This project will review and update <a href="#">IS0053</a> on the not taking reasonable care shortfall penalty.	Shortfall penalties are an integral part of IR's compliance and penalties regime. Therefore, having clear and up-to-date guidance on the application of those penalties is important.	<b>At public consultation until 31 October 2025. Being consulted under PUB00500.</b>
PUB00499	Tax administration – Shortfall penalties – Unacceptable tax position	This project will review and update <a href="#">IS0055</a> on the unacceptable tax position shortfall penalty.	Shortfall penalties are an integral part of IR's compliance and penalties regime. Therefore, having clear and up-to-date guidance on the application of those penalties is important.	<b>At public consultation until 31 October 2025. Being consulted under PUB00500.</b>
PUB00513	Working for families – family scheme income	This item will consider issues that arise for customers when determining their family scheme income for working for families tax credit purposes.	It has been suggested that guidance for customers to help them better understand what income is or is not included in family scheme income in various situations would be helpful.	Considering issues.