THE TAX INSTITUTE

15 September 2021

Board of Taxation Secretariat
The Treasury
Langton Crescent
PARKES ACT 2600

By email: RandD@taxboard.gov.au

Dear sir or madam,

Review of R&D Tax Incentive Dual-Agency Administration Model

The Tax Institute welcomes the opportunity to make a submission to the Board of Taxation (**Board**) in relation to the *Review of R&D Tax Incentive Dual-Agency Administration Model Consultation Guide*, dated July 2021 (**Consultation Guide).**

This submission has been developed in close consultation with a subcommittee of The Tax Institute's practitioner and industry-based members with expertise in this field to obtain a breadth of views on issues that impact our broader membership.

Executive summary

As part of the 2021-22 Federal Budget, the Government announced that the Board would undertake a review to evaluate the dual-agency administration model for the Research and Development Tax Incentive (**R&DTI**). The terms of reference contained in the set out, among other things, the objectives of the Review.

The R&DTI is jointly administered by the Australian Taxation Office (**ATO**) and Industry Innovation and Science Australia (**IISA**) and the Department of Industry, Science, Energy and Resources (**DISER**), with the ATO being responsible for the administration and processing of R&D tax offset claims, and IISA responsible for registering companies' R&D activities. The program is delivered by AusIndustry on behalf of IISA.

The efficient administration of the R&DTI depends on the clear delineation between the roles of the ATO and AusIndustry both in theory and in practice. In our members' experience instances where the division of responsibilities between the two agencies has become blurred are common. A frequently cited example is circumstances in which the ATO has questioned a taxpayer's eligibility, which is a matter for AusIndustry to determine.

A key concern raised is that the separation of responsibilities between the agencies has duplicated the compliance burden and costs for taxpayer when dealing with the ATO and AusIndustry separately. For example, our members have shared experiences of taxpayers being required to produce the same information to both agencies separately, even in circumstances where one agency already held the information subsequently requested by the other. These experiences give a perception of reluctance on the part of the agencies to share information with one another. It is not clear whether this is due to uncertainty within the agencies as to what information can be shared or for other reasons such as confidentiality and privacy requirements. The Tax Institute's concern is that the current model creates inefficiencies by duplicating the work required by both taxpayers and the two agencies.

The Tax Institute is of the view that the R&DTI should be administered in such a way that upholds the integrity of the regime, while giving taxpayers confidence and certainty that their claims will be dealt with in a timely, efficient and procedurally fair manner.

Many of the issues in the current dual-agency administration model could be addressed by unifying all responsibilities of administering the R&DTI under a single authority. This would eliminate confusion around the roles and responsibilities of each administrator and significantly reduce the costs for taxpayers associated with dealing with two separate agencies. It would ultimately bring about increased simplicity and certainty which, in The Tax Institute's view, is fundamental to ensuring taxpayer confidence in the regime.

We recognise that this may not be a feasible option in the immediate or short-term, given that AusIndustry is not resourced to perform both functions and it is not within the ATO's current skill set to undertake IISA's functions. However, we strongly recommend that the Board continues to explore this as a potential long-term option for the administration of the R&DTI. In such a case, we consider that it would be more appropriate for the ATO to be the single administrator. The ATO is already resourced and highly skilled to handle taxpayer applications, queries and disputes. It would be a less significant disruption for the ATO to assume IISA's role than for IISA to take on the ATO's responsibilities. We also note that having the ATO as a single administrator should mean that it would be in a position to provide high assurance ratings to taxpayers in respect of R&D which we understand is currently not possible due to the dual-agency administration.

Another long-term solution is to task the ATO with the sole responsibility for the administration of R&D incentives within the tax laws, and have IISA solely responsible for the administration of a separate grant. Further information on this option for reform and broader considerations in respect of the R&DTI and its administration is contained in The Tax Institute's Case for Change paper.[1]

In the interim, we consider that other options should be explored to reduce the uncertainty, complexity and compliance costs associated with the dual agency administration of the R&DTI. These issues can be addressed, in part, by a clear restatement of the remit of each agency and greater transparency and collaboration between them.

We would be pleased to continue to work with the Board on the ongoing Review and any reforms to the administration of the R&DTI, to ensure that the R&DTI continues to achieve its policy objectives.

Our detailed response is contained in **Appendix A**.

[1] The Tax Institute, *the* Case for Change, July 2021.

The Tax Institute is the leading forum for the tax community in Australia. We are committed to shaping the future of the tax profession and the continuous improvement of the tax system for the benefit of all. In this regard, The Tax Institute seeks to influence tax and revenue policy at the highest level with a view to achieving a better Australian tax system for all. Please refer to **Appendix B** for more about The Tax Institute.

If you would like to discuss any of the above, please contact Tax Counsel, Julie Abdalla, on 02 8223 0058.

Yours faithfully,

Peter Godber

President

APPENDIX A

We have set out below our responses to certain questions contained in the Consultation Guide. The numbering below corresponds to the questions in the Consultation Guide. Any references to or comments on UK or other foreign laws or regimes are based on our understanding of how the relevant law or regime applies.

Current administration model

1. Do you consider that the roles and responsibilities of the two administrators (ATO and IISA/DISER) are distinct and clearly understood? If not, how might they be enhanced?

Based on our understanding from our members, The Tax Institute considers that while the roles and responsibilities of the ATO and IISA/DISER should be distinct, they may not be clearly understood by taxpayers, the courts, or the agencies themselves.

In *Federal Commissioner of Taxation v Auctus Resources Pty Ltd* [2021] FCAFC 39 (***Auctus***), the Full Federal Court allowed an appeal by the Commissioner in a case concerning whether or not the Commissioner was entitled to recover an overpaid tax refund under the R&DTI. Their Honours made the following comments about the Commissioner's powers in administering the R&DTI:[2]

> *As the legislation currently stands (tax offset refunds being part of the process of assessment), if the Commissioner took the view that particular activities were not R&D activities and there was no binding finding about that, then the Commissioner would have to act on his view in performing his assessment obligation under s 166 of the ITAA 1936. In fulfilling his duty, the Commissioner is bound by a finding made by the Board if one happens to exist (s 355-705) but is otherwise responsible for administering the tax laws according to their terms. The Commissioner is not bound by the taxpayer's self-assessed view that their activities are "R&D activities". If it were, otherwise, the taxpayer's opinion about their activities constituting R&D activities would, in the absence of a finding by the Board, be determinative of this aspect of the taxpayer's eligibility to the tax offset refund.*

The Court's comments seem to suggest that the legislation in its current form gives the Commissioner the ability to make findings about whether a taxpayer's activities constitute R&D activities where IISA has not made any findings. This highlights a level of uncertainty about the division of responsibilities between the two administrators.

The Tax Institute recommends that the roles and responsibilities of the ATO and IISA/DISER be articulated in greater detail in the legislation and supporting materials. This would provide taxpayers with greater clarity and certainty and ensure that the law is interpreted and applied by the courts as intended by parliament.

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2 *Federal Commissioner of Taxation v Auctus Resources Pty Ltd* [2021] FCAFC 39 at [32].

Dealings with the current administration model

2. From your experiences, are there any aspects of the current registration, eligibility review and compliance arrangements which impede or hinder your dealings with the current administration system? What works well?

The Tax Institute's members have shared experiences highlighting certain aspects of the current registration, eligibility review and compliance arrangements which inhibit their dealings with the current administration system, outlined below. An overarching theme appears to be that the dual-agency administration model is not established in a way that facilitates cooperation between the two administrators, notwithstanding that there are elements of their respective responsibilities that are very closely related.

- Members have experienced situations where it appears that IISA is reluctant to request information from applicants which may be seen to relate to expenditure. This may potentially be because it is considered to be within the ATO's purview, notwithstanding that some such information may impact the threshold question of whether R&D activities have been carried out as registered by the applicant.
- On a related note, there is a wide perception that there is a lack of information sharing between the ATO and IISA. Although the information in question may have been provided to either agency previously, taxpayers have reported situations where they are required to produce the same information twice, or that one agency will proceed with a review, investigation, or inquiry, without consideration of relevant information that has been provided to the other agency.

  This may be due to a misplaced concern on the part of officers of either or both agencies that they may be breaching their duties of confidence.[3] This results in the applicant being required to produce the same information twice under separate requests made by IISA and the ATO, or one of the administrators proceeding without that information despite it being held by the other.

  These experiences signal to members a lack of information sharing and transparency between the two agencies. The result is additional work and compliance costs for taxpayers when engaging with these agencies, a duplication of effort as between the agencies, and ultimately, inefficiencies in the administration of the R&DTI.
- Although the ATO may refer matters to IISA, members have observed that IISA does not tend to refer matters to the ATO. This raises issues around whether taxpayers have been properly reviewed against the eligibility criteria and whether they can be confident that they can continue to benefit from the R&DTI without fear of an adverse finding in the future. Examples of matters which potentially should be referred to the ATO include whether:

  a. activities have been conducted on behalf of the applicant;

  b. expenditure is 'at risk'; and

  c. R&D carried out for a foreign resident may not comply with s 355-220.

  There does not appear to be a clear process for IISA to raise such issues with the ATO and for informing the applicant that while they may have passed the first eligibility threshold, they may be investigated for other issues by the ATO.

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[3] See Industry Research and Development Act 1986 s 47 and Taxation Administration Act 1953 Sch 1 Div 355.

- Members have raised concerns about the length of reviews and the lack of clarity around the specific process that reviews, and objections undergo between the ATO and IISA. For example, members observed that when the ATO refers matters on to the IISA for investigation, they do not necessarily share the information which prompted them to make the referral. Further, our understanding is that those reviews can be drawn-out, particularly when issues are being dealt with one at a time, rather than holistically and in a singular review.
- Members have noted difficulties when negotiating settlements with IISA in cases where there are extant issues involving the ATO. This issue is exacerbated by the fact that these proceedings generally cannot be resolved through discussions and negotiations with reference to the value of the tax concessions in question (as is common in tax disputes) since matters of expenditure are outside the scope of IISA's remit.

  One way in which such issues could be remedied is potentially by involving the ATO in these types of settlement discussions, such as requiring them to present their consideration of the merits of the taxpayer's claims. This would reduce some of the inefficiencies and duplication caused by the dual-agency administration model. For example, in *VDRZ and Innovation Australia* [2017] AATA 123, the Tribunal sought to involve the Commissioner in a conciliation between an applicant and IISA, and the agreement reached by the parties required the Commissioner's agreement to reach a full and final settlement.
- Members have shared experiences where the ATO has sent letters to taxpayers to allege that certain activities did not constitute core or supporting R&D activities as defined under sections 355-25 and 355-30 of the *Income Tax Assessment Act 1997*, (**ITAA 1997**) respectively. Although it was not clear whether the IISA was involved in the activities giving rise to these communications, our understanding is that these kinds of messages tend to be conveyed by IISA rather than the ATO since issue of eligibility for the R&DTI falls within IISA's responsibilities.

4. What is the cost to businesses in claiming the R&DTI? Where have businesses encountered complexity in the process?

The Tax Institute understands that taxpayers incur significant costs in applying the R&DTI and complying with its ongoing requirements once registered. Further, taxpayers also face the added costs associated with uncertainty and the risk of clawback, should a review of their claims or eligibility take place and be decided unfavourably to the taxpayer.

Monetary and time costs

Due to the amount of information that taxpayers must provide when applying for the R&DTI, taxpayers face a significant outlay of resources when seeking to register for the R&DTI. These the process may become protracted, and the administrative costs may compound where the agencies administering the R&DTI request additional information from taxpayers as part of this process. This can be exacerbated where the information requested by one agency is already within the possession of the other agency.

The Tax Institute's members have also indicated that they regularly incur significant compliance costs and a disproportionate investment of time in complying with the requirements of the R&DTI. As the calculation of expenses is a complex process, this requires extensive resources in order to calculate and review the computation of these amounts to ensure that claims are correct.

Due to the inherent complexity of the R&DTI rules around eligibility and calculating R&DTI claims, taxpayers are often required to engage external advisers to ensure that their R&DTI claims are correct. We are concerned that this may discourage under resourced taxpayers from applying for the R&DTI, due to a lack of funding and the requisite knowledge or expertise in completing and managing claims. These incidental costs may mean that any marginal benefits received by taxpayers under the R&DTI are consumed by the cost of outsourcing these activities to an external advisor.

Uncertainty and risk of clawback of R&DTI amounts

The inherent complexity of the R&DTI means that taxpayers continue to face uncertainty about whether they will be able to ultimately retain amounts provided to them under the R&DTI, or if the amounts will be clawed back following review activities by the ATO or IISA/DISER. Although it is difficult to quantify the cost of such uncertainty, taxpayers must be mindful that previous claims could be reviewed at any time, with any adverse findings meaning that they must return to the ATO amounts paid under the R&DTI.

The uncertainty and risk of clawback undermines the confidence of taxpayers in their position and whether or not they are able to apply the funds in their businesses. This could dissuade them from spending the amounts on capital projects or further R&D activities out of fear that these amounts may be irrecoverable if they are required to pay them back to the ATO. This level of uncertainty and risk could potentially disincentivise taxpayers interested in the R&DTI from applying altogether.

5. Would you provide any real-life examples of businesses that have recently navigated the R&DTI application process? Were there issues, challenges or frustrations encountered in the process?

The examples and anecdotes outlined in this submission are based on real-life experiences of members of The Tax Institute. We would be pleased to continue to work with the Board to share more specific details of recent experiences with the R&DTI application process.

6. Does the current administrative process impact the decision to apply for the R&DTI? How has it affected the decision to apply?

The compliance costs involved in managing and complying with the conditions of the R&DTI are high, and in our view, in many cases disproportionate to the benefits. This is due to the complexity and labour-intensive nature of the current application process. A heavy compliance burden may disincentivise some taxpayers, especially those which are under resourced or funded, from accessing the R&DTI due to the initial time investment when applying and the ongoing costs of complying with the scheme once registered.

Improvements and efficiencies

8. What changes could be made to simplify the administrative and compliance obligations for taxpayers, whilst maintaining the integrity of the program?

The Tax Institute believes that the following changes could simplify the administrative and compliance obligations for taxpayers, whilst maintaining the integrity of the system.

R&D rulings and decisions

The Tax Institute recommends that consideration is given to empowering AusIndustry to provide both public and private binding rulings in a similar manner to the ATO regarding the eligibility of taxpayers' activities. We envisage that in the case of public guidance, this would be underpinned by a consultation process similar to that which the ATO follows regarding taxpayer engagement.

In the case of private guidance, we recognise that in some ways findings by AusIndustry are akin to private binding rulings issued by the ATO. We also acknowledge the highly factual nature of R&D applications and assessments. However, we consider it would be particularly useful for a mechanism to be established to provide private binding rulings in relation to matters such as evidential requirements.

We consider that an ability for AusIndustry to provide binding guidance would provide greater transparency, clarity and certainty on how AusIndustry makes decisions about whether certain activities are eligible R&D activities for the purposes of the R&DTI. This would also ensure greater consistency in how AusIndustry makes decisions, and promote a greater level of engagement between AusIndustry and taxpayers, as is seen between taxpayers and the ATO.

Similarly, we note that there are scarce details about reviews and adjustments by IISA or the ATO pertaining to the R&DTI. This is in contrast to the regular publication of information and the data by the ATO on other areas of tax including in relation to cases, audits and adjustments. We consider that providing equivalent information about the R&DTI on a regular basis improves the transparency of the volume and types of reviews being performed. This increased transparency would improve taxpayers' confidence in the system and provide them with a greater understanding of the issues that are of concern to.

Consistency in dispute resolution process

Our understanding from members is that while the ATO is experienced in alternative dispute resolution methods and often takes a nuanced approach, the experience with IISA tends to be more rigid and black-and-white. It may be beneficial for IISA to adopt an approach to mediation more closely in line with the ATO's practices. This would create a more consistent experience and process for taxpayers when engaging with these agencies. Importantly, it would ensure that each application is dealt with on its merits and considering its facts and circumstances.

Treatment of negative findings

The ATO website provides that:

> *Findings made by AusIndustry bind us in making and amending assessments. We must use our amendment powers to give effect to findings. We must also give effect to any decision made by AusIndustry on internal review, and any decision about a finding made by the Administrative Appeals Tribunal (AAT) or a court.*[4]

[4] ATO, Effect of AusIndustry findings on R&D tax offset claims (last modified 11 Mar 2019).

Section 355-705 of the ITAA 1997 sets out the effect of findings made by Innovation and Science Australia (**Department**) on the Commissioner. Subsection 355-705(1) provides that where a certificate given to the Commissioner sets out a finding under section 27J of the Industry Research and Development Act 1986 (**IR&D Act**), the finding binds the Commissioner for the purposes of the assessment of the R&D entity for the income year. However, section 355-710, sets out the powers of the Commissioner when amending assessments in order to deal with findings of the Department, where an assessment had been made of an R&D Entity in a prior year. Subsection 355-710(1) provides that where a certificate is given to the Commissioner with respect to a finding under section 27J of the IR&D Act, the Commissioner *may* amend the R&D entity's assessment for an income year affected by the finding, at any time, for the purposes of giving effect to the finding.

Our understanding is that ordinarily the word 'may' is *prima facie* read as conferring a permissive power in the form of a discretion. In our view, there appears to be nothing in the ordinary use of the word *may* in the context of the surrounding provisions that befits a view that it operates as anything other than a discretion of the Commissioner.[5]

However, since the R&DTI is administered on the basis set out on the ATO's website, where IISA makes a negative finding in relation to a taxpayer, the ATO appears to be bound by such a determination. Our understanding is that this can mean that the ATO can require an immediate refund of any associated tax benefit. We understand that this can be the case even in circumstances where the taxpayer may be appealing the adverse finding by IISA unless arrangements to the contrary are negotiated. In our view, such ATO action should not commence until the appeal has been concluded. This will help to preserve the principles of procedural fairness and the self-assessment system.

Simplified calculation of eligible overhead costs

The current expense calculations under the R&DTI are complex and onerous. Coupled with the complexities around identifying eligible expenditure, these types of activities and calculations are typically outsourced to external advisors. The outsourcing of these activities means that taxpayers generally incur significant financial costs to ensure that their R&DTI claims are correct.

To help reduce such complexity and costs, the ATO could provide simplified formulas to provide more clarity around the calculation of R&DTI claims. We acknowledge that this may lead to some taxpayers having increased claims and other taxpayers having reduced claims across the system. However, we consider that, overall, the reduced compliance costs would improve efficiency from a compliance and administration perspective. The simplification of the calculations may also give some taxpayers more confidence in being able to correctly calculate their own R&DTI claims internally.

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5 *Samad v District Court of NSW* (2002) CLR 140 per Gleeson CJ and McHugh J.

Greater clarity for taxpayers operating outside the traditional scientific spheres

The Tax Institute's understands that members operating outside traditional scientific fields (such as pharmaceuticals or biotechnology) have consistently encountered difficulty in identifying their qualifying activities. As the guidance around qualifying activities may have originally been developed with traditional scientific businesses in mind, it is more difficult for eligible taxpayers operating outside these sectors to apply the current framework to their businesses. We suggest that guidance on qualifying activities more generally relevant be developed. This would ensure all taxpayers are equally able to understand and apply the requirements around qualifying activities.

9. What opportunities can you identify to reduce duplication between the two administrators?

The Tax Institute recommends that the Board considers the following opportunities to reduce duplication between the ATO and IISA/DISER.

Documentation of the ATO and IISA/DISER's responsibilities

The exact responsibilities and accountabilities of the two administrators should be explicitly stated in a protocol or an inter-departmental document that is made publicly available. This would provide clarity to officers within each agency as to the scope of their responsibilities and the ways in which they can work together more seamlessly. It would also allow taxpayers to refer to a central document to identify the roles played by the ATO and AusIndustry in administering the R&DTI. This should reduce circumstances of potential overreach or misunderstanding of roles on the part of the administrators or taxpayers.

Similarly, we consider that it would be beneficial for the review processes carried out by the ATO and AusIndustry to be clearly documented in a publicly available form. Such a document should detail how the administrators should interact with taxpayers, their responsibilities towards taxpayers (and vice versa), and where and how the agencies should interact with one another and the taxpayer. To some extent, this could be modelled on the ATO's taxpayer charter. This would ensure that both taxpayers and the agencies are aware of their responsibilities and what to expect from the specific steps involved in a review. Again, this would promote procedural fairness, as it sets clear guidelines for how reviews are to be conducted by all parties involved.

Information sharing

We recommend that the government considers codifying an ability for the ATO and IISA to share information and confer with each other in appropriate situations. Among other things, this would foreseeably contemplate situations where one agency has commenced proceedings or investigations in respect of a particular applicant. In such cases, consideration should be given to whether one administrator could be required to consider its position with respect to how the legislation it administers applies to a particular applicant at the same time as the other agency commences an investigation, audit, or other inquiry. This would mean that issues could be dealt with around the same time and ideally be resolved simultaneously. Overall, this would have the added benefit of providing transparency to taxpayers as to the information that is shared between the two agencies, and minimising the duplication of work by both taxpayers and the administrators.

Holistically reviewing incentives for R&D

While consideration of the way in which the R&DTI is administered is important, it is crucial to consider the operation and effectiveness of the current incentives for R&D, namely the R&DTI. Reviewing the administration of the R&DTI in isolation can only address some issues within the current model but does not take into account fundamental issues within the existing regime. A potential long-term holistic solution is to task the ATO with the sole responsibility for the administration of R&D incentives within the tax laws, and have IISA solely responsible for the administration of a separate grant. Further information on this option for reform and broader considerations in respect of the R&DTI and its administration is contained in The Tax Institute's Case for Change paper.[6]

International models and experience

11. Our review includes an examination of the international R&D administration models. From your international experiences with similar programs abroad, is there any jurisdiction in particular that you consider to be appropriate for us to focus on for further analysis?

UK single agency administration model

The Tax Institute's members have highlighted their experience with the UK's approach to administering the R&D Expenditure Credit (**RDEC**) regime. At a very high level, the RDEC program operates in a similar manner to the R&DTI in that, broadly, it provides participating taxpayers with tax credits on eligible R&D expenditure.[7]

Although in many ways the mechanics of the RDEC are functionally similar to the R&DTI, we note that the RDEC is administered by Her Majesty's Revenue & Customs (**HMRC**) as the sole responsible authority.

We acknowledge that a single agency administration of the R&DTI may not be a feasible reform in the short-term. However, we consider that a single agency administration model would address many of the concerns and issues faced by taxpayers and reduce many of the regulatory and administrative burdens borne by the ATO and IISA/DISER in administering the R&DTI.

We therefore recommend that the Board continues to explore this as a potential long-term option for the administration of the R&DTI. In such a case, we consider that it would be more appropriate for the ATO to be the single administrator. The ATO is resourced and highly skilled to handle taxpayer applications, queries and disputes. We also note that having the ATO as a single administrator should mean that it would be in a position to provide high assurance ratings to taxpayers in respect of R&D which we understand is currently not possible due to the dual-agency administration.

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6 The Tax Institute, *the Case for Change*, July 2021.

7 Refer to UK Government, HM Revenue & Customs, *Claim Research and Development (R&D) expenditure credit* (published 1 January 2007, last updated 28 May 2021).

New Zealand's single point of contact model

The Tax Institute's members have also shared their experience dealing with New Zealand's equivalent to the R&DTI (**NZ R&DTI**). New Zealand has also adopted a dual administration model for the NZ R&DTI, which is jointly administered by Inland Revenue and the Ministry of Business Innovation & Employment.

Although the NZ R&DTI is administered by two government bodies, taxpayers engage with these agencies via a single access point,[8] which also serves as a central repository for details and information for taxpayers. Considering that it may be difficult for Australia to achieve a single agency administration model in the near future, creating a single point of contact similar to the New Zealand model would address the issues arising from taxpayers needing to engage with the two agencies via separate channels.

The Tax Institute considers that this approach would reduce the administration and compliance costs borne by taxpayers in communicating and dealing with the ATO and IISA. This approach would also eliminate the need for taxpayers to produce the same information twice, as both administrators would have access to the relevant documents through the single portal.

[8] Refer New Zealand Government, *R&D funding support for New Zealand businesses*.

APPENDIX B

About The Tax Institute

The Tax Institute is the leading forum for the tax community in Australia. We are committed to representing our members, shaping the future of the tax profession and continuous improvement of the tax system for the benefit of all, through the advancement of knowledge, member support and advocacy.

Our membership of more than 11,000 includes tax professionals from commerce and industry, academia, government and public practice throughout Australia. Our tax community reach extends to over 40,000 Australian business leaders, tax professionals, government employees and students through the provision of specialist, practical and accurate knowledge and learning.

We are committed to propelling members onto the global stage, with over 7,000 of our members holding the Chartered Tax Adviser designation which represents the internationally recognised mark of expertise.

The Tax Institute was established in 1943 with the aim of improving the position of tax agents, tax law and administration. More than seven decades later, our values, friendships and members' unselfish desire to learn from each other are central to our success.

Australia's tax system has evolved, and The Tax Institute has become increasingly respected, dynamic and responsive, having contributed to shaping the changes that benefit our members and taxpayers today. We are known for our committed volunteers and the altruistic sharing of knowledge. Members are actively involved, ensuring that the technical products and services on offer meet the varied needs of Australia's tax professionals.