



RE: 5 Pillars briefing on the short list reforms/Productivity Commission and Treasury
[SEC=OFFICIAL]

From: s 47F [REDACTED]@TREASURY.GOV.AU>
Sent: Friday, 30 May 2025 2:42 PM
To: s 47F [REDACTED]@pc.gov.au>
Subject: RE: 5 Pillars briefing on the short list reforms/Productivity Commission and Treasury [SEC=OFFICIAL]

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OFFICIAL

Hi s 47F [REDACTED]

I am well, thank you.

Please find times below for Marty/Susan:

Monday 16 June	Between 11-12pm or 1-4pm
Wednesday 18 June	Between 1-2pm
Thursday 19 June	Between 2-3:30pm
Friday 20 June	Between 11-1pm

If these times don't suit, let me know and I can find some extra times.

Regards
s 47F [REDACTED]

Treasury meeting 28/11/25 [SEC=OFFICIAL]

From s 47F @pc.gov.au
Date Fri 2025-11-28 14:24
To Benjamin Mitra Kahn <benjamin.mitra_kahn@pc.gov.au>; s 47F @pc.gov.au
Cc s 47F @pc.gov.au

OFFICIAL

s 22
• [Redacted]
o [Redacted]

[Redacted]
• [Redacted]
o [Redacted]
o [Redacted]
o [Redacted]
o [Redacted]

NCT

- 20/28 \$1b, 5% NCT
 - o Rent assumption is important
 - o MEB impact aligns with what other models would suggest
 - o Impact of windfall gains/losses
 - o Communication of Murphy's rents are hard to understand
 - o Interesting to understand intersection of rents by firm size and within the financial sector

s 22
o [Redacted]

s 47F
Research Economist | Productivity

Productivity Commission
Wurundjeri, Woi-wurrung Country
Level 8, 2MQ, 697 Collins Street, Docklands VIC 3008

s 47F @pc.gov.au

Re: Feedback on the Pillar 1 interim report [SEC=OFFICIAL]

From Bultitude, Susan <Susan.Bultitude@TREASURY.GOV.AU>

Date Mon 2025-07-28 16:55

To s 47F @pc.gov.au; s 47F @treasury.gov.au; Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>; s 47F @pc.gov.au

Cc s 47F @TREASURY.GOV.AU>

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Hi s 47F,

Shane J was asking after the material s 47F agreed to pass on the other day. He was also wondering what your reactions were to our suggestions.

It sounds like he and Alex had a chat about the 'additivity' of the CFT against the CIT, with Alex arguing that you can't just add them because the CFT liability is deducted against the CIT liability. Is this consistent with your understanding? I don't think it is quite expressed this way in the paper eg some of the worked examples.

Shane also wondered whether it would be helpful to make it clear that the PC is not just seeking views on its proposed option, but also other proposals. That is, the current proposal is not the only way forward/locked in.

Susan

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From: s 47F @pc.gov.au>

Sent: Thursday, July 24, 2025 7:53:32 PM

To: s 47F @treasury.gov.au; Mitra-Kahn, Benjamin (Productivity Commission - Unclassified DLM) <Benjamin.Mitra-Kahn@pc.gov.au>; s 47F @pc.gov.au

Cc: Bultitude, Susan <Susan.Bultitude@TREASURY.GOV.AU>; s 47F @TREASURY.GOV.AU>

Subject: RE: Feedback on the Pillar 1 interim report [SEC=OFFICIAL]

OFFICIAL

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Hi s 47F,

s 22

Thanks also for reviewing paper, and for offering those thoughtful comments. We'll review them as a team and come back to you.

s 22

Thanks again, and looking forward to talking further soon,

s 47F | Inquiry and Research Manager | Research Group | s 47F
s 47F | s 47F

OFFICIAL

From: s 47F @treasury.gov.au
Sent: Thursday, 24 July 2025 5:55 PM
To: Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>; s 47F @pc.gov.au;
s 47F @pc.gov.au
Cc: Bultitude, Susan <Susan.Bultitude@TREASURY.GOV.AU>; s 47F @TREASURY.GOV.AU
Subject: Feedback on the Pillar 1 interim report [SEC=OFFICIAL]

Some people who received this message don't often get email from s 47F @treasury.gov.au. [Learn why this is important](#)

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Hi s 47F, Ben and s 47F

Thanks for the ongoing consultation and dialogue in respect of the PC's work. We have read through the Pillar 1 interim report. Well done to the whole team – it is an impressive piece of work and you have explained some quite complex tax ideas in an accessible way. We also appreciated the chance to hear from s 47F on the modelling yesterday. In reading through the report, we noted some instances where sections or phrases read on their own could be read differently to if they are in the broader context of the document or could be otherwise misinterpreted. We have set these out below along with some other comments for your consideration. Happy to discuss if it would assist.

Regards

s 47F

s 47F | Director
Corporate & International Tax Division

s 47F

- References to the CFT 'allowing companies to deduct their investment costs in full' (e.g. p5, p7) could make it clear this deduction is just within the new CFT, not against the existing CIT – otherwise they risk being misinterpreted as some form of full expensing. Similarly 'any losses can be used to offset company income tax liabilities' (eg p7, p23) should make it clear this is referring to CFT losses (i.e. the 5% of the net negative cash flow).
- References to the CFT suggesting that it 'better supports new investment' (e.g. p12, p13, p14, p21) could make it clearer that a CFT doesn't by itself support new investment, it just provides a lower disincentive to invest than the existing CIT. So it is replacing CIT with CFT that supports new investment, not the CFT itself.
- s 22 [REDACTED]
- International comparisons (p18-19) – could consider whether the 'sticker price' that taxpayers would look at after these reforms would be the CIT+CFT rate (i.e. 25% for firms up to \$1b turnover and 35% for firms above \$1b turnover). Figure 1.4 potential to be misleading as cash flow tax not included in statutory rate. Is it possible that the OECD would report 25% as the statutory rate for small and medium-sized companies (and 35% overall)?
- Page 19 – 'overall the new tax will incentivise new capital expenditure across all firm sizes' – would this be more accurate to say it would incentivise new capital expenditure across the economy (driven by higher expenditure by firms below \$1b turnover)?
- Page 23, page 25 – 'the net cashflow tax is administratively simple' is likely to understate the level of complexity of transitioning to the new regime. While it uses existing tax and accounting concepts, introducing a new tax will require systems changes for the ATO and for taxpayers and a range of new rules (e.g. integrity rules) will likely be required. Because it will operate in parallel to the CIT, there are no simplification benefits (as implied by the text). It is not clear to us that a CFT would be significantly simpler to implement than an ACE, especially as the latter is a deduction under the existing tax rather than a whole new tax.
- Comparing the CFT to the PRRT could invite some comments. PRRT legislation and administration is viewed as complex even allowing for the complexities associated with ring-fencing and associated domestic transfer pricing.
- There are some inconsistencies between the discussion of an ACE and the discussion of the CFT. Both of them require having the correct 'normal' rate of return to appropriately target rents vs normal profits. The risk of choosing the 'wrong' rate is highlighted for the ACE but not the CFT.
- s 22 [REDACTED]

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Note for File Treasury meeting [SEC=OFFICIAL]

From Barry Sterland <barry.sterland@pc.gov.au>

Date Wed 2025-09-17 11:09

To Benjamin Mitra Kahn <benjamin.mitra_kahn@pc.gov.au>; s 47F @pc.gov.au;
s 47F @pc.gov.au; Alex Robson <alex.robson@pc.gov.au>

OFFICIAL

Note For File on meeting between Diane Brown, Shane Johnston, (Treasury), Alex Robson and Barry Sterland.
3 September 2025

At Diane's request we met at Treasury to discuss the progress inquiry on a Dynamic and Resilient Economy.
We discussed the following points:

- We were planning on further empirical work on a range of options that could achieve desirable investment, dynamism and resilience outcomes. We indicated we were likely to explore further analysis of variants of the proposed Net Cash Flow Tax, Allowance for Corporate Equity and some options for immediate expensing within the structure of the CIT. We indicated we had not finally settled this range of options and would take into account stakeholder feedback.
- We were interested in engaging with the Treasury and ATO to ensure we had a comprehensive view of the range of options that could be useful to have analysis on to inform the debate, and a common understanding of the implementation issues associated with options. In the first instance this would be a meeting in the near term to inform PC decisions about modelling runs and any other analysis that needed to be commissioned (eg on implementation).
- We would commission empirical work in line with our view of the most productive options, and our resources and time constraints.
- We indicated we thought there was some scope to consider revenue negative options in this analysis. We would put forward revenue neutral options in line with our interpretation of our ToR, with additional modest revenue negative options put forward to illustrate further options that could achieve objectives while being fiscally responsible.
- The PC would make recommendations in line with its statutory obligations based on the full range of information and analysis, including stakeholder feedback. We were interested in getting further information from investors on potential responses to various options, though recognised this is difficult.

Barry Sterland
Commissioner

Productivity Commission

Wurundjeri, Woi-wurrung Country

Level 8, 2MQ, 697 Collins Street, Docklands VIC 3008

s 47F | barry.sterland@pc.gov.au

pc.gov.au



PC/Treasury/ATO Workshop 30/09/25 notes [SEC=OFFICIAL]

From **s 47F** @pc.gov.au>
 Date Tue 2025-09-30 17:14
 To **s 47F** @pc.gov.au>; **s 47F** @pc.gov.au>; **s 47F** @pc.gov.au>; Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>; **s 47F** @pc.gov.au>; **s 47F** @pc.gov.au>
 Cc **s 47F** @pc.gov.au>

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Present:

- PC: **s 47F**
- Marty Robinson (Tsy)
- **s 47F**
- **s 47F** **s 47F**
- **s 47F** (y)
- Rhys Manley (ATO)
- Paul Boehm (ATO)
- **s 47F** (ATO, TBC)
- **s 47F** (ATO)

Welcome

- Discuss implementation challenges

- s 22**
- **s 22**
 - **s 22**

Options:

- NCT-CIT: nothing of note
- **s 22**
- **s 22**

Implementation considerations

1. What are the legal issues?
2. What are the changes and impacts for the ATO's function?
3. What are the changes and impacts for taxpayers?
4. What are the broader interactions with other parts of the tax system?

s 47C

[Redacted content]

Alterations to income reporting

See CIT/CFT threshold.

Thresholds

No additional concerns.

Franking imputation

- sits with a fully integrated income tax system. Both a CFT [s 22](#) does this.
- [s 22](#)
-

[s 22](#)

-
-

[s 47F](#)

Research Economist | Productivity

Productivity Commission

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[s 47F](#)

pc.gov.au



Corporate Tax - next steps [SEC=OFFICIAL]

From Bultitude, Susan <Susan.Bultitude@TREASURY.GOV.AU>

Date Thu 2025-09-11 11:54

To s 47F @pc.gov.au; Benjamin Mitra Kahn <benjamin.mitra_kahn@pc.gov.au>
Cc s 47F @TREASURY.GOV.AU; s 47F
s 4 / F @treasury.gov.au; s 47F @TREASURY.GOV.AU; Robinson, Marty
<Marty.Robinson@TREASURY.GOV.AU>; s 4 / F @pc.gov.au

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s 47E(d)

[Redacted]

[Redacted]

- [Redacted]
- [Redacted]
- [Redacted]

[Redacted]

[Redacted]

[Redacted]

Warm regards,

Susan

Susan Bultitude (she/her)
First Assistant Secretary (Acting) | Corporate and International Tax Division | Revenue Group
Phone: +61 2 6263 4415 | s 47F
The Treasury, Langton Crescent, Parkes ACT 2600
www.treasury.gov.au
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RE: Treasury-PC-ATO Workshop 29092025.pptx [SEC=OFFICIAL]

From: s 47F [redacted]@treasury.gov.au>
Date: Tue 2025-09-30 13:57
To: s 47F [redacted]@pc.gov.au>

📎 1 attachment (2 MB)

Treasury PC ATO Workshop 29092025.pptx;

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Hi s 47F [redacted]

As discussed

I left the thresholds as green tick because we are retaining existing tax rates with 2 different thresholds, but if it relates to introducing new thresholds should switch to a cross

Thanks

s 47F [redacted]

OFFICIAL

From: s 47F [redacted]@pc.gov.au>
Sent: Tuesday, 30 September 2025 11:45 AM
To: s 47F [redacted]@treasury.gov.au>
Subject: Treasury-PC-ATO Workshop 29092025.pptx [SEC=OFFICIAL]

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UNOFFICIAL

Thanks s 47F [redacted]

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Australian Government
Productivity Commission

Workshop: Implementation challenges with different taxes

30 September 2025

pc.gov.au





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Agenda

§ 22 [Redacted]

[Redacted]

3. Discussion: the implementation challenges

i. CIT/CFT hybrid models

§ 22 [Redacted]

[Redacted]

s 22

[REDACTED]

[REDACTED]



s 22



s 22

[REDACTED]

s 22

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



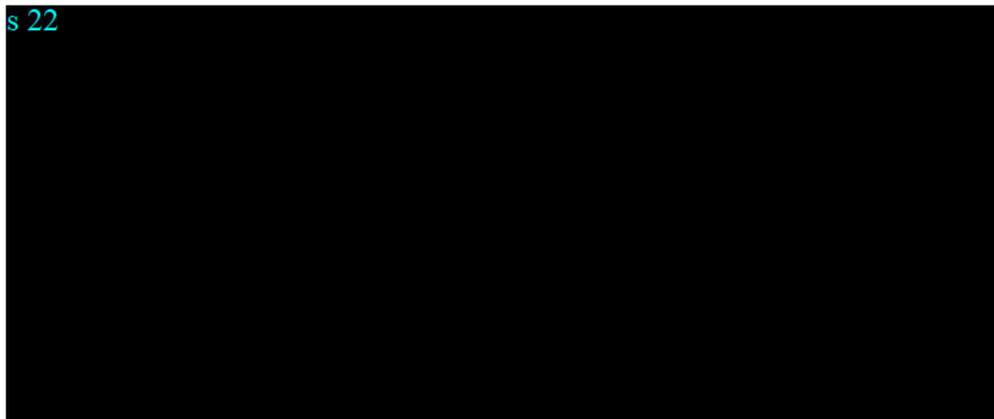
**Framing the discussion: the options
under consideration**

Three broad options under consideration



CIT/CFT hybrid

s 22



Company income tax/cash flow tax hybrid

- Cut the corporate income tax (CIT) rate to 20% for companies earning up to \$1 billion. Maintain the 30% rate for companies earning above \$1 billion.
- Introduce a net cash flow tax (NCT) of 5%.
 - The NCT operates as the CIT while fully deducting depreciating and non-depreciating capital, excluding interest deductibility, and uplifting losses at the long-term bond rate.
- The financial sector is incorporated by leveraging reporting requirements of APRA-regulated companies. Scope to expand inclusion by taxing net-positive interest for companies not regulated by APRA.
- To tax rents appropriately, deduct the CIT as an expense on the NCT tax base before calculating the NCT.

s 22

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

s 22

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Discussion: the implementation challenges

Implementation considerations

A description of the important implementation considerations is below

Administrative considerations

Item	Description
Financial sector	How to apply the tax to the financial sector
Starting balance	An initial deduction based upon previous investment choices
Sequencing	Sequencing of multiple taxes when calculating deductions
Identifying new equity	Ensuring only new equity receives a deduction for normal returns
Alterations to income reporting	Changes to reporting requirements under the current income tax form
Thresholds	Minimising the distortionary impacts of a threshold

Conceptual considerations

Item	Description
Dividend imputation	Should the rules for dividend imputation change?
Uplift rate/s 22	What should the uplift rate on losses be? What should the 'normal' return on equity be?

Questions

To help the discussion, consider the following questions when considering the implementation challenges on the next slide:

1. What are the legal issues?
2. What are the changes and impacts for the ATO's function?
3. What are the changes and impacts for taxpayers?
4. What are the broader interactions with other parts of the tax system?

Implementation considerations

Below is an initial summary of the implementation implications for each option. A tick implies there are significant implications (and requires further discussion); the cross implies minor or no implications

Administrative considerations

CIT/CFT hybrid

Financial sector	✓
Starting balance	✓
Sequencing	✓
Identifying new equity	✗
Alterations to income reporting	✓
Thresholds	✓

Conceptual considerations

CIT/CFT hybrid

Dividend imputation	✓
Uplift rate/s 22	✓

s 22

s 22

s 22



Contact: communications@pc.gov.au

MEETING INVITES

From: [REDACTED]@pc.gov.au
Sent on: Thursday, December 4, 2025 10:48:56 PM
To: [REDACTED]@pc.gov.au; [REDACTED]
[REDACTED]@anu.edu.au; [REDACTED]@treasury.gov.au;
[REDACTED]@TREASURY.GOV.AU; Johnson,
Shane <Shane.Johnson@TREASURY.GOV.AU>; marty.robinson@treasury.gov.au;
Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>;
susan.bultitude@treasury.gov.au
CC: Alex Robson <alex.robson@pc.gov.au>; Barry Sterland <barry.sterland@pc.gov.au>;
[REDACTED]@pc.gov.au; [REDACTED]
[REDACTED]@pc.gov.au; [REDACTED]@pc.gov.au;
[REDACTED]@TREASURY.GOV.AU; [REDACTED]
[REDACTED]@TREASURY.GOV.AU; [REDACTED]
[REDACTED]@TREASURY.GOV.AU
Subject: Discussion of CGE modelling results [REDACTED], Treasury, PC [SEC=OFFICIAL]

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From: [REDACTED]@pc.gov.au
Sent on: Sunday, September 21, 2025 10:35:15 PM
To: [REDACTED]@pc.gov.au; Robinson,
Marty <marty.robinson@treasury.gov.au>; Bultitude,
Susan <susan.bultitude@treasury.gov.au>; [REDACTED]
[REDACTED]@treasury.gov.au; [REDACTED]
[REDACTED]@treasury.gov.au; [REDACTED]@treasury.gov.au;
[REDACTED]@ato.gov.au; Benjamin Mitra-Kahn <benjamin.mitra-
kahn@pc.gov.au>; [REDACTED]@pc.gov.au; [REDACTED]
[REDACTED]@pc.gov.au; [REDACTED]@pc.gov.au;
[REDACTED]@pc.gov.au; [REDACTED]@pc.gov.au
CC: [REDACTED]@ato.gov.au; [REDACTED]
[REDACTED]@ato.gov.au; Rhys Manley <Rhys.Manley@ato.gov.au>;
[REDACTED]@TREASURY.GOV.AU; [REDACTED]
[REDACTED]@TREASURY.GOV.AU; [REDACTED]
[REDACTED]@TREASURY.GOV.AU
Subject: PC/Treasury/ATO workshop [SEC=UNOFFICIAL]

UNOFFICIAL

Agenda

1. Welcome – PC

2. Update on the PC Pillar 1 Inquiry and road ahead – PC

3. Scoping implementation questions

Legal framework issues, broader system interactions, changes and impacts on ATO functions, changes and impacts on taxpayers

a. CIT/CFT model with financial sector coverage (PC)

§ 22 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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From: § 47F [REDACTED] <benjamin.mitra-kahn@pc.gov.au> on behalf of Benjamin Mitra-Kahn
Sent on: Friday, September 12, 2025 5:56:57 AM
To: Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>; § 47F [REDACTED]@pc.gov.au; § 47F [REDACTED]@pc.gov.au; Susan.Bultitude@TREASURY.GOV.AU; § 47F [REDACTED]@treasury.gov.au
CC: § 47F [REDACTED]@pc.gov.au; § 47F [REDACTED]@pc.gov.au; § 47F [REDACTED]@pc.gov.au; § 47F [REDACTED]@TREASURY.GOV.AU; § 22 [REDACTED]@TREASURY.GOV.AU; § 47F [REDACTED]@TREASURY.GOV.AU

Subject: Corporate tax meeting between the PC and Treasury
As discussed, meeting between the PC and Treasury to discuss corporate tax. If this time doesn't suit please let me know and I can make other arrangements.

§ 47F [REDACTED]

§ 47F [REDACTED] | Personal Assistant to § 47F [REDACTED]
§ 47F [REDACTED] Project Support Officer – Productivity Stream | § 47F [REDACTED]

§ 47F [REDACTED] | Work days: Monday, Wednesday and Friday (wfo)
Tuesday and Thursday (WFH) 9.30 am-5.00pm (times may vary)

OFFICIAL

Hi Ben,

I am free next Wednesday afternoon except for 2.30-3.30pm. I have copied this to § 47F [REDACTED] who can help set something up. I'd be keen to make sure that § 47F [REDACTED] can make it – he is the new manager of our Corporate Tax Policy Unit.

Susan
Susan Bultitude (she/her)
Phone: +61 2 6263 4413 | § 47F [REDACTED]

OFFICIAL

OFFICIAL

From: Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>

Sent: Friday, 12 September 2025 2:36 PM

To: Bultitude, Susan <[\[REDACTED\]@pc.gov.au](mailto:[REDACTED]@pc.gov.au)>

Cc: [\[REDACTED\]@TREASURY.GOV.AU](mailto:[REDACTED]@TREASURY.GOV.AU); <>; [\[REDACTED\]@pc.gov.au](mailto:[REDACTED]@pc.gov.au)

<Marty.Robinson@TREASURY.GOV.AU>; Robinson, Marty

<graeme.davis@pc.gov.au>; [\[REDACTED\]@pc.gov.au](mailto:[REDACTED]@pc.gov.au)

<[\[REDACTED\]@pc.gov.au](mailto:[REDACTED]@pc.gov.au)>; [\[REDACTED\]@pc.gov.au](mailto:[REDACTED]@pc.gov.au)

Subject: RE: Corporate Tax - next steps [SEC=OFFICIAL]

OFFICIAL

Hi Susan,

Thank you for reaching out, and for the ongoing conversation.

[§ 22](#)
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

In terms of the modelling, [§ 47F](#) is working through the model design and build at present, and I don't think we have a fixed date on when scenarios need to be locked in with him – it is more a matter of ensuring that the dynamic model is capable of folding in the right complexities. I think we will have the parameters to explore the [§ 22](#) [§ 22](#) CFT proposals we have heard – but open to any details you think are important to incorporate in the modelling frame.

[§ 22](#)
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Best
Ben

Benjamin Mitra-Kahn He/Him | Assistant Commissioner | Inquiries and Research | p. 03 9653 2274 | [§ 47F](#)

[Schedule a meeting](#) | [Chat on Teams](#)

OFFICIAL

OFFICIAL

From: Bultitude, Susan <Susan.Bultitude@TREASURY.GOV.AU>

Sent: Thursday, 11 September 2025 11:55 AM

To: § 47F [redacted] <[\[redacted\]@pc.gov.au](mailto:[redacted]@pc.gov.au)>; Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>

Cc: Richards, Oliver <Oliver.Richards@TREASURY.GOV.AU>; § 47F [redacted] <[\[redacted\]@treasury.gov.au](mailto:[redacted]@treasury.gov.au)>; § 47F [redacted] <[\[redacted\]@TREASURY.GOV.AU](mailto:[redacted]@TREASURY.GOV.AU)>; Robinson, Marty <Marty.Robinson@TREASURY.GOV.AU>; § 47F [redacted] <[\[redacted\]@pc.gov.au](mailto:[redacted]@pc.gov.au)>

Subject: Corporate Tax - next steps [SEC=OFFICIAL]

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Hi Ben and § 47F [redacted]

I'm reaching out (as acting Div Head, in Marty's absence) following on from the meeting between Alex, Barry, Diane and § 47F [redacted] last week.

I understand it was agreed that Treasury would assist PC in its further consideration of the main corporate tax options that been raised by stakeholders as part of its inquiry and through the Economic Reform Roundtable, namely:

- the PC's proposed corporate tax cut and cash flow tax model, as per its interim report;
- § 22 [redacted]
- [redacted]

§ 22 [redacted]

§ 22 [redacted]

§ 22 [redacted]

Warm regards,

Susan
Susan Bultitude (she/her)
 First Assistant Secretary (Acting) | Corporate and International Tax Division | Revenue Group
 Phone: +61 2 6263 4415 | § 47F [redacted]
 The Treasury, Langton Crescent, Parkes ACT 2600
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 *The Treasury acknowledges the Traditional Owners of country throughout Australia, and their continuing connection to land, waters and community. We pay our respects to them, their cultures and Elders past, present or emerging.*

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From: Robinson, Marty <Marty.Robinson@TREASURY.GOV.AU>
Sent on: Tuesday, October 28, 2025 10:29:19 PM
To: Robinson, Marty <Marty.Robinson@TREASURY.GOV.AU>; Bultitude, Susan <Susan.Bultitude@TREASURY.GOV.AU>; § 47F [REDACTED]@treasury.gov.au; Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>; § 47F [REDACTED]@pc.gov.au
CC: 5 Pillars <5pillars@pc.gov.au>
Subject: Pillar One report - corporate tax reform - offsetting costs and administration considerations [SEC=OFFICIAL:Sensitive]

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From: § 47F [REDACTED]@treasury.gov.au
Sent on: Thursday, November 27, 2025 6:48:37 AM
To: Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>; § 47F [REDACTED]@TREASURY.GOV.AU; H § 47F [REDACTED]@TREASURY.GOV.AU; § 47F [REDACTED]@TREASURY.GOV.AU; § 47F [REDACTED]@TREASURY.GOV.AU
CC: § 47F [REDACTED]@TREASURY.GOV.AU; § 47F [REDACTED]@TREASURY.GOV.AU
Subject: PC/Treasury discussion on modelling inputs [SEC=OFFICIAL]

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From: Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>
Sent on: Thursday, November 20, 2025 11:12:38 PM
To: Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>; Robinson, Marty <Marty.Robinson@TREASURY.GOV.AU>; Bultitude, Susan <Susan.Bultitude@TREASURY.GOV.AU>; § 47F [REDACTED]@treasury.gov.au; § 47F [REDACTED]@pc.gov.au; § 47F [REDACTED]@pc.gov.au
Subject: Tax modelling catch-up

§ 22 [REDACTED]

Hi all,

As discussed via email, look forward to talking on Monday.

Best
Ben

From: § 47F [REDACTED]@treasury.gov.au
Sent on: Thursday, July 31, 2025 4:36:00 AM
To: § 47F [REDACTED]@treasury.gov.au; § 47F [REDACTED]@pc.gov.au; Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>; § 47F [REDACTED]@pc.gov.au
CC: Bultitude, Susan <Susan.Bultitude@TREASURY.GOV.AU>; RG CITD CTB Corporate Tax Policy <RGCITDCTBCorporateTaxPolicy@TREASURY.GOV.AU>
Subject: Lessons learned on MRRT/PRRT design [SEC=OFFICIAL]

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From: 5 Pillars <5pillars@pc.gov.au>
Sent on: Tuesday, July 15, 2025 11:29:58 PM
To: 5 Pillars <5pillars@pc.gov.au>; § 47F [REDACTED]@pc.gov.au; Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>; § 47F [REDACTED]@pc.gov.au; § 47F [REDACTED]>; marty.robinson@treasury.gov.au; § 47F [REDACTED]@pc.gov.au; susan.bultitude@treasury.gov.au; § 47F [REDACTED]@treasury.gov.au
CC: Alex Robson <alex.robson@pc.gov.au>; Barry Sterland <barry.sterland@pc.gov.au>; § 47F [REDACTED]@pc.gov.au; § 47F [REDACTED]@TREASURY.GOV.AU; § 47F [REDACTED]@TREASURY.GOV.AU; § 47F [REDACTED]@pc.gov.au; § 47F [REDACTED]@treasury.gov.au; VC-Diane.Brown <VC-Diane.Brown@TREASURY.GOV.AU>; § 47F [REDACTED]@treasury.gov.au

OFFICIAL

s 47F @treasury.gov.au; s 47F
@TREASURY.GOV.AU>

Subject: P1: Modelling Meeting

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From: 5 Pillars <5pillars@pc.gov.au>
Sent on: Friday, June 20, 2025 4:12:41 AM
To: 5 Pillars <5pillars@pc.gov.au>; Alex Robson <alex.robson@pc.gov.au>; Barry Sterland <barry.sterland@pc.gov.au>; Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>; s 47F @pc.gov.au>; Marty.Robinson@TREASURY.GOV.AU
CC: s 47F s 47F
@pc.gov.au> s 47F
pc.gov.au>
Subject: P1: Treasury/Productivity Commission

Thank you for agreeing to meet with the Commission, a list of attendees is below

Attending from Treasury

Marty Robinson - Corporate & International Tax Division

Attending from Productivity Commission

Alex Robson – Deputy Chair

Barry Sterland – Commissioner

Benjamin Mitra-Kahn – Assistant Commissioner

(other team members)

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From: Kelly, James <James.Kelly@TREASURY.GOV.AU>
Sent on: Tuesday, May 20, 2025 11:48:21 PM
To: Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>; Danielle Wood <danielle.wood@pc.gov.au>
CC: s 47F @treasury.gov.au>
Subject: RE: Tax discussion [SEC=OFFICIAL]

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Thanks Danielle, Ben

§ 47F cc'd can assist finding a time. On our end that will involve me, Shane Johnson and Jason McDonald attending, and possibly one other.

James

James Kelly — Deputy Secretary

Markets Group

P +61 2 6263 3798 § 47F

§ 47F

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From: Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>

Sent: Tuesday, 20 May 2025 3:27 PM

To: Wood, Danielle (Productivity Commission - Unclassified DLM)

<Danielle.Wood@pc.gov.au>; Kelly, James <James.Kelly@TREASURY.GOV.AU>

Subject: Re: Tax discussion [SEC=OFFICIAL]

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OFFICIAL

Hi James,

§ 22

Do you want us to work with your EO or EA to find a time?

Just let me know and we will make it happens

Best

Ben

Benjamin Mitra-Kahn

Assistant Commissioner

Productivity Commission

OFFICIAL

From: Danielle Wood <danielle.wood@pc.gov.au>

Sent: Tuesday, May 20, 2025 2:29:29 PM

To: Kelly, James <James.Kelly@TREASURY.GOV.AU>

Cc: Benjamin Mitra-Kahn <benjamin.mitra-kahn@pc.gov.au>

Subject: Tax discussion [SEC=OFFICIAL]

OFFICIAL

Hi James

Thanks for the chat today. Our team working on the 'dynamic economy' productivity inquiry (pillar one) – were keen to take you up on the offer for a discussion with some of the Henry review team. Putting you in touch with Ben Mitra Kahn who is leading the team to organise.

Best
Danielle

Danielle Wood
Chair

Productivity Commission

Wurundjeri, Woi-wurrung Country
Level 8, 2MQ, 697 Collins Street, Docklands VIC 3008
p. 03 9653 2230 | [s 47F](#) | danielle.wood@pc.gov.au

[s 47F](#)

pc.gov.au



The Productivity Commission acknowledges the Traditional Owners of Country throughout Australia and their continuing connection to land, waters and community. We pay our respects to Aboriginal and Torres Strait Islander Cultures, Country and Elders past and present.

Pillar One report - corporate tax reform - offsetting costs and administration considerations
[SEC=OFFICIAL]

From Robinson, Marty <Marty.Robinson@TREASURY.GOV.AU>

Date Tue 2025-10-28 12:10

To Benjamin Mitra Kahn <benjamin.mitra_kahn@pc.gov.au>

Cc s 47F @pc.gov.au; s 47F @pc.gov.au; Johnson, Shane <Shane.Johnson@TREASURY.GOV.AU>; Bultitude, Susan <Susan.Bultitude@TREASURY.GOV.AU>; s 47F @treasury.gov.au; s 47F @TREASURY.GOV.AU>

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Hi Ben

I hope you're well. I am circling back following a recent conversation that Diane Brown had with Alex and Barry, to see whether we might be able to schedule a discussion on some of the topics covered. s 22 We have had some further engagement with the ATO regarding administration and implementation issues we thought it would be useful to update you on as well.

If there's some time later this week or early next week that would suit at your end, please let us know. s 47F copied, can coordinate calendars at this end.

Regards,
Marty

Marty Robinson
First Assistant Secretary
Corporate and International Tax Division
P +61 2 6263 2740 s 47F
E marty.robinson@treasury.gov.au

treasury.gov.au
Langton Crescent, Parkes ACT 2600
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Date: 23 June 2025

Shane Johnson (Acting Deputy Secretary, Revenue Group); Jason McDonald (First Assistant Secretary, Competition Taskforce Division); and James Kelly (Deputy Secretary, Markets Group)

Meeting details

Who:	Shane Johnson, Acting Deputy Secretary, Revenue Group Jason McDonald, First Assistant Secretary, Competition Taskforce Division James Kelly Deputy Secretary, Markets Group
When:	3:00 – 3:45 pm, 23 June 2025
Contact	Shane Johnson < shane.johnson@treasury.gov.au > Jason McDonald < jason.mcdonald@treasury.gov.au > James Kelly < james.kelly@treasury.gov.au >
PC attendees	Alex Robson Barry Sterland Other Pillar 1 team members Join the meeting now
Where	s 22
Country/nation	Wurundjeri (Melbourne); Ngunnawal and Ngambri (Canberra)
Notes by	s 47F
Follow-up	

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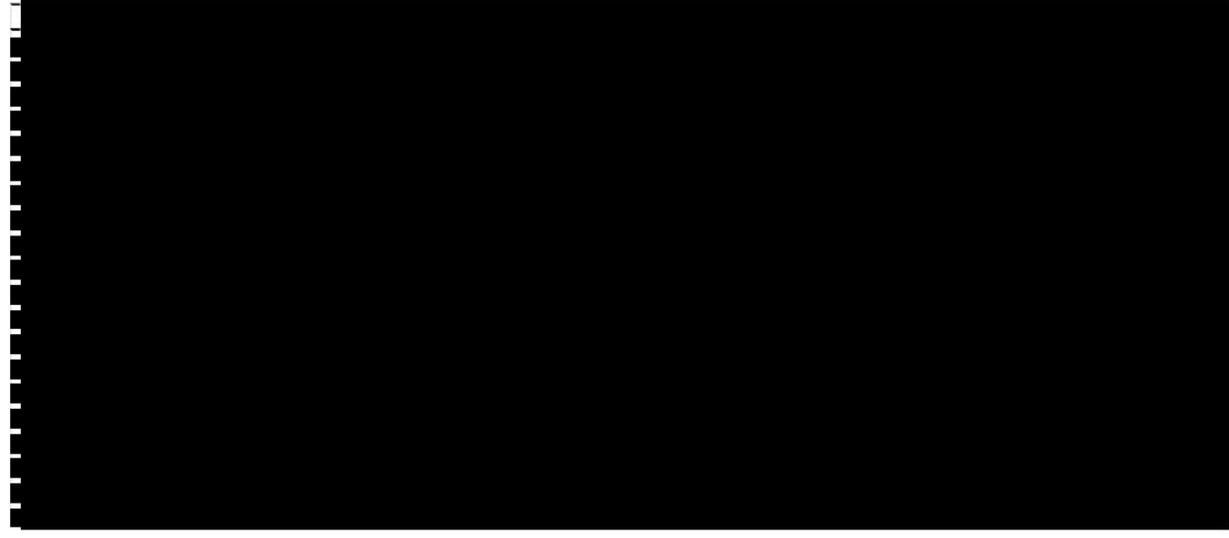
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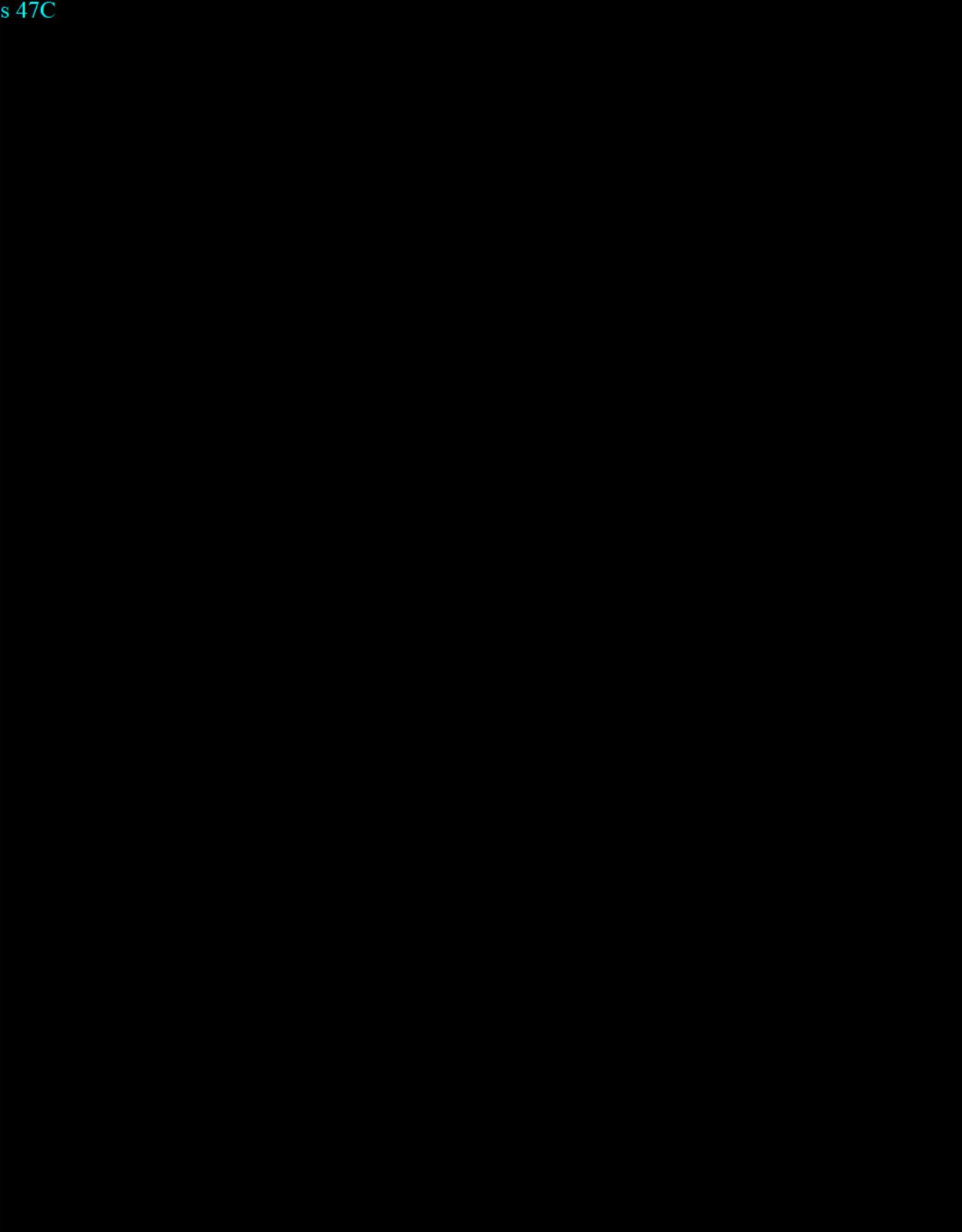
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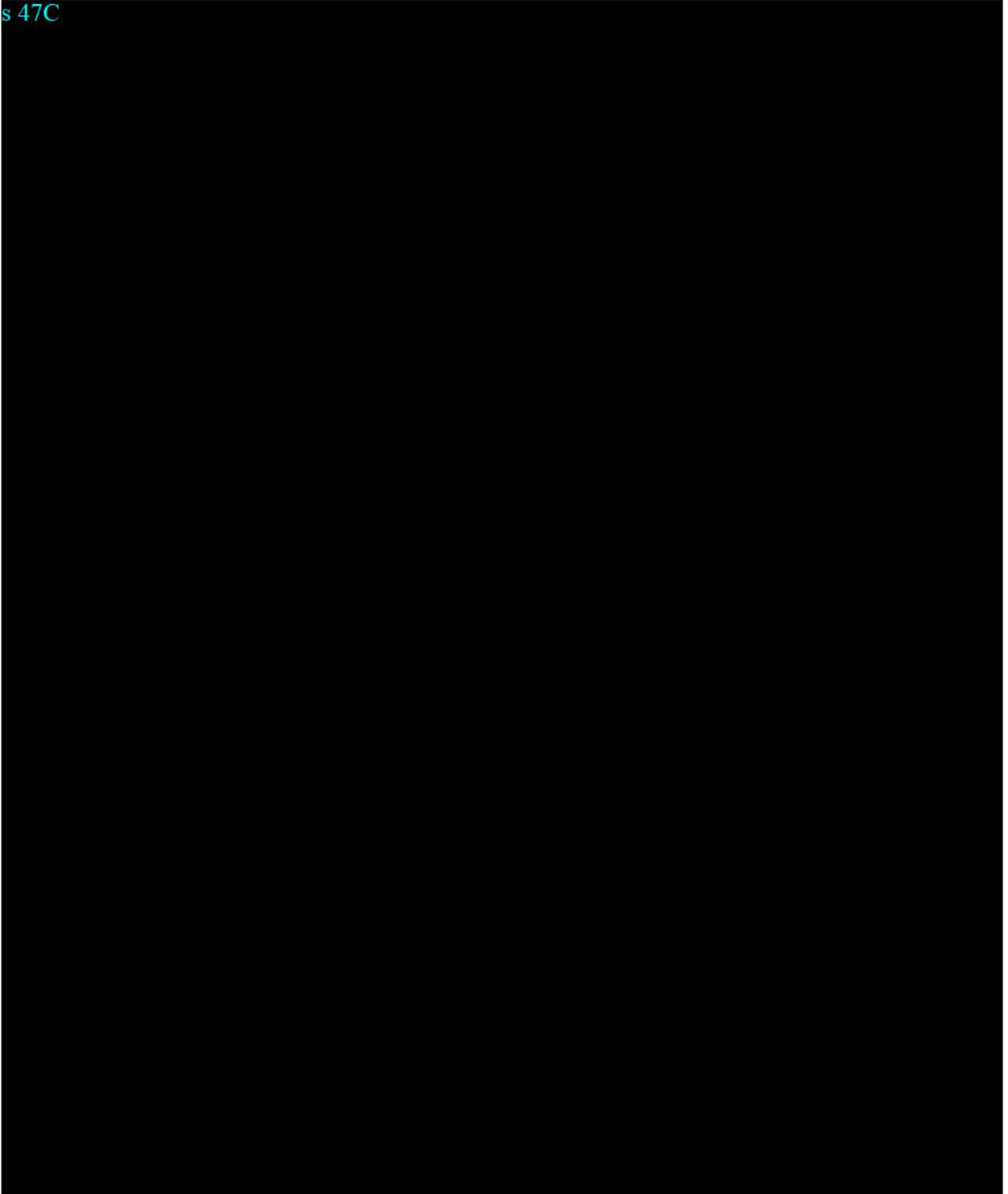
Concluding questions

8. Are there any other thoughts, insights, or recommendations you would offer us as we work towards the interim report for this inquiry?

s 47C



s 47C



Meeting Topic: Conversation following up 23 June meeting with Treasury

Date: 24 June 2025 at 2pm

Attendees:

Attending from Treasury

Marty Robinson - Corporate & International Tax Division

Other team members

Attending from Productivity Commission

Alex Robson – Deputy Chair

Barry Sterland – Commissioner

Benjamin Mitra-Kahn – Assistant Commissioner

(other team members)

Notes

PC: General thoughts?

§ 22 [Redacted]

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