

# THE INTERACTION OF THE SHARE IDENTIFICATION RULES WITH TAPER RELIEF: AUTHOR'S PREFACE

The following article is intended to be controversial. It challenges one aspect of the interpretation of the taper relief rules that has prevailed since the rules came into force in 1998.

The article suggests that there is a lacuna within the current legislation that might be turned to the taxpayer's advantage in appropriate cases. Conversely, it could lead to taxpayers in other situations finding that their entitlement to taper relief is considerably less than anticipated.

I expect the matter will be resolved by the Courts in due course. Either they will confirm that a lacuna exists or, they will endorse the currently prevailing interpretation, the failings of which were discussed recently in *Davies v Hicks*.

In the meantime, in my capacity as joint managing editor, I would welcome contributions challenging the stance I have taken.

KMG