



Agribusiness Intensive

📅 11-12 Jun 2026

★ CPD 12

The Tax Institute gratefully acknowledges the generous assistance of members of the Organising Committee:

Emma Carr, Macpherson Kelley, Chair, Intensive Organising Committee

Belinda Crowley, Vincents

Karen Goodfellow, CTA, Goodfellow Tax Advisory

Paul Hobbs, CTA, Power Tynan

Greig Hubbard, Deloitte

Catherine Nufer, CTA, Hamilton Locke

Gary Thomas, CTA, Gary Thomas Proprietary Limited





Welcome

On behalf of the organising committee, I am delighted to welcome you to the **tenth Agribusiness Intensive**, taking place **11–12 June 2026**, both in person at **voco Brisbane City Centre** and online. As we celebrate this milestone year, the Intensive continues to bring together leading advisers and industry experts from across Australia for two days of insights, practical discussion and valuable connections within the agribusiness community.

Agribusiness remains one of Australia's most dynamic sectors, and the issues facing primary production businesses, and the professionals who advise them, are constantly evolving. This year's program has been carefully curated to explore the technical, legal and commercial developments shaping the industry, while providing practical guidance advisers can apply immediately in their work.

Across the two days, our expert speakers will unpack key topics including (but not limited to):

- Small Business CGT Concessions
- Succession planning
- Management of trusts and estates
- Family Trust Elections
- Land tax

Beyond just technical content, the Agribusiness Intensive is an opportunity to connect with peers from across the country, exchange ideas and hear real-world experiences from those working at the forefront of agribusiness advisory. Whether you are attending in Brisbane or joining us online, you can expect practical insights, lively discussion and valuable takeaways.

We look forward to welcoming you to the **2026 Agribusiness Intensive**.



Emma Carr, Macpherson Kelley
Chair, Intensive Organising Committee

Early bird pricing offer
Register on or before Friday, 15 May 2026 to save!

Technical program

Day 1 Thursday, 11 June 2026

Time *AEST	Session
8:30 – 8:45am	Registration
8:45 – 9:00am	Welcome and opening address
9:00 – 10:00am	<p>Session 1: Harvesting the ‘gain’ – CGT traps and reliefs Speaker: David Hall, CTA, Findex</p> <p>Not every farming business qualifies for the small business CGT concessions, yet capital gains events remain a key part of farm restructures and exits. This session looks beyond the concessions to examine the rollovers and relief provisions that apply when farming families restructure, corporatise or sell. Drawing on recent issues and ATO guidance, we’ll explore the CGT rules that continue to cause confusion for advisers and clients alike.</p>
10:00 – 10:30am	Morning tea
10:30 – 11:30am	<p>Session 2: Control, fairness and the future – Success in succession Speaker: Greg Russo, Greg Russo Law</p> <p>Succession remains one of the defining strategic challenges of Australian agribusiness. This session examines the structural, legal and interpersonal complexities shaping modern rural succession, and the tools that actually work in practice:</p> <ul style="list-style-type: none">• Trust control and continuity;• Testamentary trust strategies;• Corporate and hybrid models;• Land ownership and family equity; and• Real-world succession pressures.
11:30am – 12:30pm	<p>Session 3: The hard yards – Small Business CGT Concessions Speaker: Linda Tapiolas, CTA, Cooper Grace Ward Lawyers</p> <p>A deep dive into the technical pressure points that consistently challenge farming families, landrich enterprises, and multientity rural groups. This session will focus on the structural realities of agribusiness and where they collide with Division 152, with practical guidance on navigating the traps that matter most:</p> <ul style="list-style-type: none">• Active vs passive rural assets;• Mixeduse assets;• The silent dealbreaker – the MNAV test; and• Trusts and the significant individual.

Technical program

Day 1 Thursday, 11 June 2026 *continued*

Time *AEST	Session
12:30-1:30pm	Lunch
1:30-2:30pm	<p>Session 4: Division 7A on the farm – Loans, UPEs and 30 years of confusion Speaker: Mark Molesworth, CTA, BDO</p> <p>Despite being in place for over three decades, Division 7A remains one of the most misunderstood areas of the tax law – by clients and advisers alike. With the ATO signalling increased scrutiny and expecting advisers to understand and manage the rules properly, the stakes have never been higher.</p> <p>This session will examine key developments and problem areas, including:</p> <ul style="list-style-type: none">• The pending High Court Appeal decision in Bendel;• Management of difficult provisions such as historical UPEs and loans impacted by interest rate changes;• The persistent myth of what constitutes a loan, when UPEs arise and what is (and isn't) a complying loan agreement; and• Increased scrutiny surrounding Interposed Entity Arrangements, 'round robin' repayments and distributable surplus misconceptions.
2:30-3:00pm	Afternoon tea



Technical program

Day 1 Thursday, 11 June 2026 continued

Time *AEST	Session
3:00–4:00pm	<p>Session 5: Beyond the boundary fence – Discretionary Trusts unpacked Speaker: DJ Alexander, CTA, QLD Bar</p> <p>Trusts remain the backbone of many agribusiness structures, yet discretionary trusts are still widely misunderstood. This session explores the common disconnect between what clients believe their trust does and what the trust deed provides, including issues around control, ownership and decision-making.</p> <p>The session will also provide practical guidance on end-of-year trust resolutions and highlight the courts’ increasing focus on the proper exercise of trustee discretion.</p>
4:00–5:00pm	<p>Session 6: Trusts, taxes and tractor tracks – Stories from the field Panelists: Fran Becker, Hamilton Locke, David Hall, CTA , Laura Hanrahan, Hall & Wilcox Facilitator: Gary Thomas, CTA, Gary Thomas Proprietary Limited</p> <p>In this lively panel session, experienced practitioners share real-world “war stories” from advising farmers, family businesses, and agribusiness investors. Panelists will highlight key lessons, common pitfalls, and practical strategies for managing complex client situations. Attendees will take away actionable insights on risk management, structuring solutions, and advisory best practices to better support agribusiness clients in a rapidly changing environment.</p>
5:00pm	Networking function



Networking function

Join your colleagues, peers and our esteemed presenters for an evening of drinks, canapes and networking.

Date: Thursday, 11 June 2026

Time: 5:00–7:00pm

Venue: voco Brisbane City Centre

Price: Inclusive for all full registration delegates
Additional tickets are \$80 per person, see registration form for details

Dress: Business casual

Technical program

Day 2 Friday, 12 June 2026

Time *AEST	Session
8:30 – 9:30am	<p>Session 7: Family Trust Elections – The one tick box that can ruin Christmas on the farm Speaker: Kim Barnes, McInnes Wilson Lawyers</p> <p>Family Trust Elections continue to sit firmly on the ATO’s radar and remain highly relevant in the agribusiness sector, where family structures and succession planning are common. Advisers are constantly navigating these elections – whether pre-empting issues, supporting restructures, or managing the uncertainty created by complex and sometimes unclear legislation.</p> <p>This session will revisit the history and purpose of Family Trust Elections, unpack key technical issues including the 45-day holding rule, and highlight just how serious the consequences can be when things go wrong. Through practical case studies, we’ll explore common traps and provide insights to help advisers confidently guide their farming clients through this critical but often misunderstood area.</p>
9:30 – 10:30am	<p>Session 8: The dirt on Land Tax – Cases every adviser needs to know about Speaker: Duncan Bedford, ATI, McCullough Robertson, Jordi Morgan, McCullough Robertson</p> <p>This session takes a deep dive into recent land tax cases affecting agribusiness, with a focus on primary production exemptions and practical implications for advisers. Gain insights from real-world case studies to better navigate risk, planning, and compliance for their clients including topics such as:</p> <ul style="list-style-type: none">• Land tax developments over the past 12 months;• Primary production exemptions and how they apply across different jurisdictions;• Variations and differences across cases and practical implications for agribusiness clients; and• Practical strategies for advising clients on land tax, exemptions, and risk management.
10:30 – 11:00am	Morning tea
11:00am – 12:30pm	<p>Session 9: Hot topics round up Speakers: Gary Thomas, CTA, Gary Thomas Proprietary Limited, Mailene Wheeler, Vincents</p> <p>This three-part session will discuss the latest issues impacting advisers in the Agribusiness space including an update on the recent Federal Budget, the latest in Superannuation including Payday Super, Div 296 and more.</p>
12:30 – 1:30pm	Lunch

Technical program

Day 2 Friday, 12 June 2026 *continued*

Time *AEST	Session
1:30 – 2:30pm	<p>Session 10: Management of tax controversies – Lifecycle of a dispute Speaker: Jack Colley, ATI, West Garbutt, Alex Whitney, CTA, West Garbutt</p> <p>Managing a tax dispute can be complex, especially in agribusiness where structures, land, and seasonal revenue add extra layers of risk. This session walks through the full lifecycle of a dispute – from early risk identification to audits and objections – with practical strategies for engaging the ATO effectively and protecting your clients.</p> <ul style="list-style-type: none">• Understanding the lifecycle of a tax dispute – From risk and review to audit and objection.• Engaging with the ATO at each stage – When to respond, request extensions, or involve other advisers.• Importance of evidence and what documentation to retain when making decisions; and• Practical strategies for advisers to protect clients and manage disputes efficiently.
2:30 – 3:00pm	Afternoon tea
3:00 – 4:00pm	<p>Session 11: Beyond the numbers – The non-tax issues Panelists: ANZ, Mark Rasmussen, QRIDA</p> <p>Discover the broader challenges and opportunities shaping agribusiness today. This session brings together industry experts to share practical insights on financing, investment, and emerging market trends, helping advisers support clients beyond tax.</p>
4:00pm	Intensive close



Presenters

DJ Alexander, CTA, is a barrister at the QLD Bar. He advises on all taxes, with a focus on assisting clients manage ATO, QRO and ACNC audits, objections, litigation and rulings. DJ also frequently provides specialist tax opinions in various contexts such as family law property settlements, deceased estates and liquidations.

Kimberley Barnes has extensive experience across taxation and revenue specialising in small business entities, high net wealth individuals, public companies, and not-for-profit entities. Kimberley has a comprehensive understanding of the intricacies of tax law and provides legal services and solutions to both businesses and private clients and advises on a range of Federal and state tax matters, including the taxation of trusts, corporate income tax, GST, duty and payroll tax. Kimberley works closely with clients and adopts a strategic and practical approach to achieve favourable outcomes and navigate complex legal and taxation matters.

Fran Becker is Partner at Hamilton Locke where she helps jointly leads the private client team, Hamilton Locke Private, and is an active member of the Food and Agribusiness industry

group. Fran acts for privately owned businesses, families and high net worth individuals advising on succession and business transition planning, structuring and asset protection, and commercial and rural property transactions. Fran strives to provide value-driven and commercially effective strategies and solutions for her clients. She has experience acting on a number of legal matters including acting in business and rural property acquisitions, advising on individual and business succession plans and providing asset protection and structuring advice. She has a specialty helping large Family Groups and Family Office arrangements. Fran has practical experience in the agribusiness industry, having grown up and been involved in the industry all her life. Originally from Central Queensland, Fran now helps runs a family beef cattle enterprise in the Maranoa region where she takes an active involvement in the day-to-day operations of her family business.

Duncan Bedford, ATI, is a partner in the McCullough Robertson tax team with a focus on State taxes, transaction structuring, and implementation. As the head of the McCullough Robertson Food and Agribusiness team, Duncan has a background in general commercial law and brings a practical approach

to the advice he provides to clients. Duncan also specialises in foreign investment into Australia, particularly in the Ag sector.

Jack Colley, ATI, is a Senior Associate at West Garbutt based in Brisbane. Jack is a lawyer and chartered accountant and advises on a wide range of tax and revenue issues, including income tax, capital gains tax, foreign tax issues (including residency), taxation of trusts, GST, FBT, payroll tax and other state taxes. Jack has acted for clients in a range of matters, including before both federal and state Courts and Tribunals, during ATO audits, objecting to ATO decisions, seeking private rulings from the ATO and providing technical advice. Jack has acted for a range of clients, including accountants and financial advisors, SMEs, family business, corporate groups and individuals, across various industries including agribusiness, retail, medical and allied health.

David Hall, CTA, is a Tax Partner at Findex and Crowe Australia based in Townsville. David regularly provides tax advisory services to the firm's North Queensland clients and other accounting and law firms on a large range of areas including: restructures, succession

arrangements, business and property sales and acquisitions to ensure clients achieve their personal aims and tax-effective outcomes. David has over 40 years' experience is an expert on the small business CGT concessions and the agri-sector, and regularly deals with a large number of agri-clients through both Findex and his tax consulting to other accounting and legal firms. David holds a Master of Taxation from the University of New South Wales, a Bachelor of Commerce from JCU, FCPA, Tax Agent, Chartered Tax Adviser.

Laura Hanrahan works with families to provide tailored personal and business succession solutions. Her tailored succession planning includes drafting complex wills, testamentary trusts, enduring powers of attorney, discretionary trusts, self managed superannuation trusts, binding death benefit nominations and deeds of family arrangement. Laura also has a particular focus on self managed superannuation funds. Including the establishment of SMSFs and other compliant SMSF investment structures, compliance advice and death benefit planning and payment. Every family is different and Laura enjoys using her creativity to help clients create a succession plan which works for them.

Presenters

Mark Molesworth, CTA, is a tax partner at BDO and a member of The Tax Institute's SME Technical Subcommittee. Mark has many years of experience in advising taxpayers with respect to all areas of taxation, including CGT, FBT and income tax. He also provides taxation advice to other smaller accounting and legal practices in respect of their clients.

Mark Rasmussen is a seasoned financial executive with over 35 years of leadership experience across the banking, insurance, and agribusiness sectors. As Chief Lending Officer at the Queensland Rural and Industry Development Authority (QRIDA), Mark oversees the strategic delivery of a diverse portfolio of financial assistance schemes, supporting regional growth and resilience across Queensland.

Greg Russo has almost 30 years' experience in succession planning, administration and litigation and is one of Victoria's most experienced and respected succession law solicitors. With a background in pure mathematics, Greg not only understands the implications of planning decisions on future taxation, SMSF, trust and estate administration, he is also able to break down complex concepts and structures logically and explain options to clients

in a way that empowers them to take positive action and ownership for their decisions. Using the knowledge and insights that he has acquired over three decades, he crafts unique solutions to complex succession problems. Greg teaches both mathematics and law, regularly presents CPD succession events to solicitors, accountants and other professionals in Victoria, Queensland, and online. He has also presented professional development events for health professionals in both Cambodia and Vietnam. Greg is an LIV Wills & Estates Accredited Specialist, a chairperson of the LIV Specialist Accreditation Education Advisory Committee, a committee member of the LIV Accredited Specialisation Board, a board member of the Mount Eliza Community Bank, a member of STEP, and is recognised in Doyle's Guide, in Victoria, as a Leading Wills and Estates Litigation Lawyer and a Leading Wills, Estates and Succession Planning Lawyer.

Linda Tapiolas, CTA, is a Partner in the Cooper Grace Ward Lawyers Commercial team. She provides a range of support services to accountants, financial planners, and other professional advisers. This includes technical advice on complex tax, CGT

and Div 7A issues, as well as acting on business sales and acquisitions to ensure clients achieve commercial and tax-effective outcomes. Prior to joining Cooper Grace Ward, Linda worked as an accountant for 18 years advising clients on capital gains, business acquisitions and restructuring. She also conducted seminars and training sessions on various topics including CGT small business concessions.

Gary Thomas, CTA, is the principal of Gary Thomas Proprietary Limited, a specialist tax advisory firm. His clients are other accounting firms and legal practitioners who regularly refer their client matters to him for advice or opinions. Gary has been in practice for over 40 years, predominantly in the private group space with a focus on businesses and families in regional Australia. Gary has a particular interest in trusts and estates, along with management of tax controversies.

Mailene Wheeler is a Director in Superannuation Advisory and specialises in all aspects of SelfManaged Superannuation Funds (SMSFs). Her expertise includes taxation and administration of SMSFs, retirement planning, estate and succession planning, contribution strategies, limited recourse borrowing arrangements

and reviewing investment structures to ensure legislative compliance. As a superannuation specialist, Mailene focuses her expertise into empowering people to take control of their super. She does this by working closely with not only her clients, but also their tax and/or financial advisers. Mailene not only works for her clients but educates them to be more involved in their own superannuation story. She takes the approach that there is never a dumb question when it comes to your super.

Alex Whitney, CTA, is a qualified lawyer and chartered tax advisor and advises in respect of income tax, GST, stamp duty and other state taxes. Alex acts for a broad range of clients, including family businesses, high wealth private groups, national non-profit organisations, deceased estates and corporate groups. He has acted on large transactions which required significant tax involvement, provided tax advice on complex structures and transactions, and has represented clients in complex audits, objections, Administrative Tribunal matters and appeals to the Federal Court. The Doyle's Guide 2022 included Alex on its list of Tax Law Rising Stars – Australia, a national list of non-partner tax lawyers who have been identified for their work and expertise in tax.

Venue and accommodation



voco Brisbane City Centre

85/87 N Quay, Brisbane City QLD 4000

Brisbane isn't lovingly called BrisVegas for nothing, and charming, playful voco Brisbane City Centre is right at home in the buzzing, sun-drenched Queensland capital. Conveniently located on the banks of the Brisbane River in a precinct undergoing an exciting renaissance, voco Brisbane City Centre's North Quay position delivers on premium yet unstuffy accommodation for the leisure-seeker and business traveller alike. With cushy bedding, vibrant art, smart in-room technology, and bathroom amenities that melt the stress of any day away, the 194 premium rooms are more than just a place to rest your head. In the morning, kick-start your day with a proper barista coffee and get the lowdown on where to go, what to see and where to eat in Brisbane from our warm, genuine staff.

At voco Brisbane sustainability is also at the forefront of every decision. They look after the planet with the same care as they look after their guests. You can relax knowing that everything from your super comfy bed to the bridgeable straws is designed to reduce their impact on the environment.

Getting there

voco Brisbane City Centre is approximately a 20-minute drive from Brisbane Airport.

For those in Brisbane, voco Brisbane City Centre is conveniently located a 10-minute walk from Brisbane Central Train Station.

Parking

Car parking is available within walking distance to voco Brisbane City Centre at [40 Tank Street, Brisbane](#).

Accommodation

Favourable room rates have been negotiated and secured at voco Brisbane City Centre. Accommodation bookings can be made by contacting the tax institute directly [here](#).

Please note that as per hotel booking conditions, a credit card is required for guaranteed purpose when confirming the booking. Full payment will be taken upon check in unless otherwise specified. Cancellation is free until 6pm one day prior to arrival. All additional hotel incidentals, including breakfast, remain the responsibility of delegates, and individuals will be responsible for payment of the balance of their account when checking out of the hotel. Please note that extra charges may be incurred for additional guests and will be charged to individual room accounts upon checkout.



Event information

Confirmation of registration

Please note you will receive two separate emails in the form of a tax invoice at the time of payment and a confirmation email at registration completion.

Continuing Professional Development (CPD)

Attendance at this event counts for 12 hours of CPD with The Tax Institute.

The Tax Institute's attendee hub

This event will be accessible to all delegates via our dedicated attendee hub. Program information, materials (technical papers and presentations), survey forms and more will be available via The Tax Institute's virtual attendee hub. All delegates are encouraged to access the platform prior to the event. Technical papers and PowerPoint presentations will be available on the attendee hub to all participating delegates approximately five days before the event. Delegates will receive instructions on accessing the virtual attendee hub by email.

Delegate list

A delegate list will be included on the attendee hub to assist with networking. Please indicate at the time of registration if you do not want your name to be included. Alternatively, you can edit your profile visibility settings in the virtual attendee hub at any time during the event.

Dress code

Business or business casual attire is suitable for the duration of the event including the Networking function.

Networking function

Thursday, 11 June 2026

The Networking function will be held onsite at voco Brisbane City Centre after the last session on day one.

The Networking function is included in the event registration fee for delegates, and additional tickets can be purchased for accompanying persons and guests at a cost of \$80.

Special dietary and accessibility requirements

Please indicate any special dietary requirements at the time of registration. Please email us with any accessibility requirements at nationalevents@taxinstitute.com.au.

Cancellation policy

The Tax Institute reserves the right to alter, amend or cancel all or any of the arrangements contained in the program. Should a face-to-face event be cancelled due to an event beyond The Tax Institute's reasonable control including 'an act of god', 'pandemic', 'health-related event' or 'government requirements', we will endeavour to transition to an online format to deliver the event. If there is a difference in price, a credit will be provided to delegates to be used at a future event.

It is a condition of acceptance of registration that an administration fee of 20% of the registration fee be charged for cancellation if you can no longer attend the event. Cancellations must be received in writing by The Tax Institute five working days prior to the event. No refund will be given for cancellations received within five working days of the event. A replacement may be nominated. If the replacement is not a member, the non-member registration fee will apply. CPD hours will be allocated to the designated attendee.

The Tax Institute cannot accept responsibility for delegates' late transport arrivals or non-arrivals due to delays.

Privacy

We take your privacy seriously, and our policy can be viewed at: <https://www.taxinstitute.com.au/about-us/privacy-copyright-disclaimer>.

Enquiries

For further information regarding this event, please contact the Events Team on 1300 829 338 or nationalevents@taxinstitute.com.au.

For registration enquiries, please contact customeradmin@taxinstitute.com.au.

Registration

Registration inclusions

	Online access to presentations and technical papers	Morning/ afternoon tea/ lunches	Networking function*
Full registration This registration option entitles one delegate to attend the entire event.	✓✓✓	✓✓✓	✓✓✓
Online full registration This registration option entitles one delegate to attend the entire event virtually.	✓✓✓		

*Additional tickets to the Networking function can be purchased on the registration form.

Discounts

Early bird registration

All registrations received and paid on or before Friday, 15 May 2026 will be entitled to an early bird discount.

Please note: The registration fee does not include accommodation, hotel incidentals or transfers.

Group discounts

Purchase three full registrations (early bird or standard) and receive a fourth full registration for free. The free fourth registration must be of equal or of less value to the four paid registrations.

This offer cannot be redeemed in conjunction with any other promotional offer or code. All attendees must be from the same firm and all registration forms must be submitted together. For further information please contact the national events team on 1300 829 338 or nationalevents@taxinstitute.com.au.

Register now!

Register online
▶

Register via form
▶

included in this brochure



A tax invoice and confirmation letter will be sent on receipt of your registration. Please photocopy for additional delegates and retain original copy for your records. All prices quoted are in Australian dollars and include GST where applicable. ABN 45 008 392 372.

1 Registration

Please see page 13 for registration inclusions.

Full registration – 12 CPD hours

	Member	New member*	Non-member
Early bird registration Register on or before Friday, 15 May 2026	<input type="checkbox"/> \$1,495	<input type="checkbox"/> \$1,915	<input type="checkbox"/> \$1,795
Standard registration Register after Friday, 15 May 2026	<input type="checkbox"/> \$1,695	<input type="checkbox"/> \$2,115	<input type="checkbox"/> \$1,995

Online registration – 12 CPD hours

	Member	New member*	Non-member
Early bird registration Register on or before Friday, 15 May 2026	<input type="checkbox"/> \$1,495	<input type="checkbox"/> \$1,915	<input type="checkbox"/> \$1,795
Standard registration Register after Friday, 15 May 2026	<input type="checkbox"/> \$1,695	<input type="checkbox"/> \$2,115	<input type="checkbox"/> \$1,995

I understand that the registration fees do not include printed materials. Access to materials will be electronic.

Networking function

The Networking function is INCLUDED in the registration fee for delegates attending the full intensive.

Thursday, 11 June 2026 at voco Brisbane City Centre

- Yes, I WILL be attending the Networking function OR
 No, I WILL NOT be attending the Networking function
 Yes, I require additional tickets for the Networking function at \$80 per person

No. x tickets at \$80 each: \$

Dietary requirements:

2 Delegate contact details

Member no.:

If your member details are up-to-date, you can skip this section.

Title: Mr Mrs Miss Ms Date of birth:

First name:

Last name:

Position:

Company:

Address:

Suburb: State: Postcode:

Telephone: Mobile:

Email:

Please tick this box if you do not wish your name to be included on the delegate list provided to all attendees for networking

*Become a member and save!

Not a member of The Tax Institute yet? Sign up for membership along with your event registration and:

- save over \$215 on Affiliate membership on the first 12 months
- access member-only prices to this and future events
- access all member-only technical resources.

Find out more about membership at taxinstitute.com.au/membership





I hereby apply for membership of The Tax Institute and declare that I am a person of good fame, integrity and character. I agree to be bound by the Constitution of The Tax Institute.

Signature:

Date of signature:



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-  [facebook.com/thetaxinstitute](https://www.facebook.com/thetaxinstitute)
-  twitter.com/taxinstituteoz
-  [instagram.com/thetaxinstitute_](https://www.instagram.com/thetaxinstitute_)

