

and assessed the income tax due thereon, equal to those respective amounts specified in the return; and

- (b) the taxpayer's return is treated for all purposes of this Act as a notice of the income tax assessment served on the taxpayer by the Commissioner-General on the day the return was furnished by the taxpayer.

83. Assessment of income tax-payers who have not furnished income tax returns

(1) If an income taxpayer fails to furnish an income tax return for a tax year by the due date, the Commissioner-General may, based on any available information and to the best of the Commissioner-General's judgment, determine the chargeable income of the taxpayer and make an assessment of the income tax due thereon for the year.

(2) As soon as possible after making an income tax assessment under this section, the Commissioner-General shall serve the income taxpayer with notice of the assessment stating

- (a) the chargeable income of the taxpayer for the year;
- (b) the amount of income tax due;
- (c) the amount of income tax paid, if any;
- (d) the amount of any penalty and interest payable (if any) in respect of the income tax due; and
- (e) the time, place, and manner of objecting to the assessment.

(3) The making of an income tax assessment under this section is an alternative to the application of subsection (2) of section 196.

84. Amendment of income tax assessments

(1) Subject to this section, the Commissioner-General may amend an income tax assessment by making such alterations or additions to the assessment as the Commissioner-General considers necessary to ensure that an income taxpayer is liable for the correct amount of income tax for the tax year to which the assessment relates.

(2) The amendment of an income tax assessment of an income taxpayer under subsection (1) may be made –

- (a) in the case of fraud or wilful neglect by or on behalf of the taxpayer, at any time; or
- (b) in any other case, within six years of the date the Commissioner-General served or is treated as having served notice of the assessment on the taxpayer.

(3) An income taxpayer may furnish the Commissioner-General with a revised return for a tax year either as required under subsection (2) of section 196 or on the taxpayer's own motion.

(4) A revised return furnished under subsection (3) on the income taxpayer's own motion shall be furnished within six years of the date the Commissioner-General served or is treated as having served notice of the assessment to which the revised return relates.

(5) If an income taxpayer furnishes a revised return in accordance with subsections (3) and (4) –

- (a) the Commissioner-General is treated as having made a revised determination of the chargeable income of the taxpayer and made an amended income tax assessment of the income tax payable thereon as set out in the revised return; and
- (b) the taxpayer's revised return is treated for all purposes of this Act as notice of the amended income tax assessment served on the taxpayer by the Commissioner-General on the day on which the revised return was furnished by the taxpayer.

(6) If a notice of an income tax assessment (in this section referred to as the "original assessment") has been amended under subsection (1) or (5), the Commissioner-General may further amend the original assessment within the later of –

- (a) six years after the Commissioner-General has served or is treated as having served notice of the original assessment on the income taxpayer; or
- (b) one year after the Commissioner-General has served or is treated as having served notice of the amended income tax assessment on the income taxpayer.