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Public Ruling
General:

**ADMINISTRATIVE ARRANGEMENT—
APPLICATION OF REVENUE AND GRANTS
LEGISLATION FOR BOOST TO BUY AND
HELP TO BUY PARTICIPANTS**

A public ruling, when issued, is the published view of the Commissioner of State Revenue (the Commissioner) on the particular topic to which it relates. It therefore replaces and overrides any existing private rulings, memoranda, manuals and advice provided by the Commissioner in respect of the issue(s) it addresses. Where a change in legislation or case law (the law) affects the content of a public ruling, the change in the law overrides the public ruling—that is, the Commissioner will determine the tax liability or eligibility for a concession, grant or exemption, as the case may be, in accordance with the law.

What this ruling is about

1. This public ruling sets out the terms of an administrative arrangement that enables the Commissioner to administer the *Duties Act 2001* (Duties Act), *First Home Owner Grant and Other Home Owner Grants Act 2000* (Grants Act) and *Land Tax Act 2010* (Land Tax Act) (together, the revenue and grants legislation), on the basis that transfer duty, the First Home Owner Grant (grant) and land tax are unaffected by participation in the Boost to Buy or Help to Buy shared equity programs.
2. On 15 December 2025, the Queensland Government opened applications for the Boost to Buy shared equity program (Boost to Buy). It is administered and monitored by the Queensland Treasury Corporation (QTC). Boost to Buy is a Queensland-based non-statutory home ownership assistance initiative administered in accordance with the Boost to Buy Home Ownership Scheme Information Statement.¹ Boost to Buy assists eligible participants to purchase homes through an equity contribution from the Queensland Government of up to 25% of the purchase price of an existing home, or up to 30% of the purchase price of a new home. The Queensland Government's interest is secured by way of a mortgage over the home.

¹ Available at treasury.qld.gov.au/files/boost-to-buy-information-statement.pdf

3. On 5 December 2025, the Commonwealth Government opened applications for the Help to Buy shared equity program (Help to Buy). It is administered and monitored by Housing Australia (HA). Help to Buy is a national statutory home ownership assistance initiative, administered in accordance with the *Help to Buy Act 2024* (Cwlth) (Help to Buy Act). In order to participate in the program, states needed to pass enabling legislation. In Queensland, Help to Buy is implemented under the *Help to Buy (Commonwealth Powers) Act 2024*. Help to Buy assists eligible participants to purchase homes through an equity contribution from the Commonwealth Government of up to 30% of the purchase price of an existing home, or up to 40% of the purchase price of a new home. The Commonwealth Government's interest is secured by way of a mortgage over the home.
4. Under the normal operation of the revenue and grants legislation, participation in a shared equity program could limit a participant's ability to access transfer duty home concessions, the grant and land tax home exemptions for a home purchased under a shared equity arrangement. Participation could also affect the transfer duty treatment of acquisitions of further interests in the property by the participant (e.g. if the participant makes voluntary repayments).
5. On 23 May 2026, the Treasurer, Minister for Energy and Minister for Home Ownership approved an administrative arrangement to enable the Duties Act, Grants Act and Land Tax Act to be administered on the basis that transfer duty, the grant and land tax are unaffected by participation in Boost to Buy or Help to Buy. This will provide certainty for participants about the treatment of homes under a Boost to Buy arrangement² or a Help to Buy arrangement³ (an Arrangement) for revenue and grants purposes.

Duties Act

Transfer duty home concessions

6. Under the Duties Act, transfer duty is imposed on the dutiable value of dutiable transactions, including transfers⁴, and agreements for the transfer⁵, of land in Queensland. Where a home owner purchases a home, first home or vacant land on which a first home is to be constructed, the Duties Act provides transfer duty concessions that reduce the amount of transfer duty payable on the transaction.⁶
7. Pursuant to the administrative arrangement, where a participant purchases a home or land under an Arrangement, the participant will be able to access the transfer duty home concessions in the same way as other home buyers, subject to meeting the relevant conditions.

Subsequent acquisitions

8. Under the Duties Act, a dutiable transaction also arises when a person acquires a further interest in land.⁷ A participant in an Arrangement may acquire a further interest when, for

² 'Boost to Buy arrangement' means an arrangement between the Queensland Treasury Corporation, on behalf of the state, and an individual under which the individual participates in the Boost to Buy scheme.

³ Help to Buy arrangement has the meaning given by section 6 of the Help to Buy Act.

⁴ Section 9(1)(a) of the Duties Act

⁵ Section 9(1)(b) of the Duties Act

⁶ Chapter 2, Part 9 of the Duties Act

⁷ Sections 9(1)(a) and (b) of the Duties Act

example, they make a voluntary repayment to the state or QTC, or to the Commonwealth or HA (the shared equity partner), resulting in the acquisition of further interests in the land.

9. Pursuant to the administrative arrangement, participants will not be liable for transfer duty on acquisitions of further interests in the land from their shared equity partner (e.g. because of a 'buy back') under an Arrangement.

Grants Act

10. Under the Grants Act, the grant is payable on an application if the applicant (or each of the applicants) satisfies the eligibility criteria⁸ and has entered into an eligible transaction that has been completed.⁹
11. All persons who will be an owner of the home on completion of the eligible transaction must be included as an applicant.¹⁰ Under s.7 of the Grants Act, a person is a home owner if the person has a relevant interest in the land on which the home is built.
12. Pursuant to the administrative arrangement, to ensure a participant purchasing a home under an Arrangement will be able to access the grant in the same way as other eligible first home buyers, an interest held by a shared equity partner will not be a relevant interest for the purposes of the grant.

Land Tax Act

13. The Land Tax Act imposes land tax on the taxable value of taxable land owned by each owner of land in Queensland as at midnight on 30 June each year.¹¹
14. A land tax exemption applies to land used by an owner as their home (home exemption).¹²
15. The concept of owner for land tax purposes is broad and includes a person who is jointly or severally entitled to receive rents and profits from the land.¹³
16. Pursuant to the administrative arrangement, a shared equity partner will not be taken to be the owner of land purchased under an Arrangement. This will ensure that eligibility for the home exemption will be determined based on the participant's circumstances alone.

⁸ Sections 10(1)(a) and 11–15 of the Grants Act

⁹ Section 10(1)(b) of the Grants Act

¹⁰ Section 17 Grants Act

¹¹ Sections 6 and 7 of the Land Tax Act

¹² Section 41 of the Land Tax Act

¹³ Section 10 of the Land Tax Act

Ruling and explanation

Defined terms

17. The following definitions apply for the purpose of the administrative arrangement:
- (a) 'Boost to Buy' is a Queensland-based non-statutory home ownership assistance initiative administered in accordance with the Boost to Buy Home Ownership Scheme Information Statement.¹⁴
 - (b) 'Help to Buy' is a national statutory home ownership assistance initiative, administered in accordance with the *Help to Buy Act 2024* (Cwlth). In Queensland, Help to Buy is implemented under the *Help to Buy (Commonwealth Powers) Act 2024*.
 - (c) 'Boost to Buy arrangement' means an arrangement between the QTC, on behalf of the state, and an individual under which the individual participates in the Boost to Buy scheme.
 - (d) 'Boost to Buy scheme' has the meaning given in section 2A of the *Rural and Regional Adjustment Regulation 2011*.
 - (e) 'Help to Buy arrangement' has the meaning given by section 6 of the Help to Buy Act.
 - (f) 'Housing Australia' or 'HA' means Housing Australia continued in existence under the *Housing Australia Act 2018* (Cwlth), section 7.
 - (g) 'Queensland Treasury Corporation' or 'QTC' means the corporation sole mentioned in the *Queensland Treasury Corporation Act 1988*, section 5(2) as preserved and continued in existence under the name and style 'Queensland Treasury Corporation'.

Duties Act

18. The following paragraphs apply for the purposes of administering the Duties Act.
19. To avoid any doubt, all the provisions of the Duties Act and the *Taxation Administration Act 2001* (Taxation Administration Act) continue to apply unless their operation is modified by the administrative arrangement set out in this public ruling. For example, existing eligibility criteria for transfer duty home concessions remain unchanged.

Transfer duty home concessions

20. For assessing liability for transfer duty on a dutiable transaction that is the transfer, or an agreement for the transfer, of land purchased under:
- (a) a Boost to Buy arrangement, the state and QTC are taken not to have an interest in the land
 - (b) a Help to Buy arrangement, the Commonwealth and HA are taken not to have an interest in the land.

¹⁴ Available at treasury.qld.gov.au/files/boost-to-buy-information-statement.pdf

Subsequent acquisitions

21. Transfer duty is not imposed on a transfer of an interest in land under a:
- (a) Boost to Buy arrangement from the state or QTC to an individual who is a party to the arrangement
 - (b) Help to Buy arrangement from the Commonwealth or HA to an individual who is a party to the arrangement.
22. If transfer duty was imposed on the dutiable transaction in accordance with paragraph 20, no transfer duty is intended to be imposed for the transfer of a further interest in the land to a participant from the state or QTC, or from the Commonwealth or HA (as the case may be). For example, transfer duty is not intended to be imposed if, because of a voluntary repayment by the participant(s), the participant(s) acquires further interests in the land under the arrangement from the shared equity partner, since the participant(s) would have been assessed against the entire dutiable value of the property at the time of purchase.

Example 1—Refinancing to pay the government's equity

Henri purchases a home under a Boost to Buy arrangement. Later, he decides to make a voluntary repayment of the government's equity share in the home. This results in an increase in his share in the home. Henri does not pay transfer duty on the acquisition of further interests in the home, because he was assessed against the entire dutiable value of the property at the time of purchase.

23. Despite the paragraph above, to remove any doubt, transfer duty is still intended to be imposed where a participant is removed from, or a new participant is added to, a Boost to Buy arrangement or Help to Buy arrangement in accordance with the normal operation of the Duties Act.

Example 2—Adding a participant

August purchases a home under a Help to Buy arrangement. Later, they add Suzi to the title of the home. Suzi's acquisition of the interest in the home may attract duty, subject to the normal operation of the Duties Act.

Example 3—Removing a participant

Lupita and Jo purchase a home together under a Boost to Buy arrangement. Later, Lupita buys Jo out of their share of the home. Lupita's acquisition of Jo's interest in the home may attract duty, subject to the normal operation of the Duties Act.

Grants Act

24. The following paragraphs apply for the purposes of administering the Grants Act.
25. To avoid any doubt, all provisions of the Grants Act continue to apply unless their operation is modified by the administrative arrangement set out in this public ruling. For example, existing eligibility criteria for the grant remain unchanged.

26. For the definition of 'relevant interest' in section 8, section 8(2) will be taken to include the following provisions:
- (a) An interest is not a relevant interest if it is held by the state or QTC in land purchased, or to be purchased, under a Boost to Buy arrangement.
 - (b) An interest is not a relevant interest if it is held by the Commonwealth or HA in land purchased, or to be purchased, under a Help to Buy arrangement.
27. The above paragraph will only apply in relation to the First Home Owner Grant, and not in relation to any other grants administered under the Grants Act (i.e. HomeBuilder¹⁵ and Regional Home Building Boost grants).¹⁶

Land Tax Act

28. The following paragraphs apply for the purposes of administering the Land Tax Act.
29. To avoid any doubt, all provisions of the Land Tax Act and Taxation Administration Act continue to apply unless their operation is modified by the administrative arrangement set out in this public ruling. For example, existing eligibility criteria for land tax home exemptions remain unchanged.
30. Despite the definition of 'owner' in section 10, the Land Tax Act is taken to include the following provisions:
- (a) The state and QTC are taken not to be the owner of land purchased under a Boost to Buy arrangement.
 - (b) The Commonwealth and HA are taken not to be the owner of land purchased under a Help to Buy arrangement.

Date of effect

31. This public ruling takes effect from 15 December 2025 for Boost to Buy arrangements and from 5 December 2025 for Help to Buy arrangements.

Michelle Scott
Acting Commissioner of State Revenue
Date of issue: 12 June 2026

¹⁵ Payable under Part 3B of the Grants Act

¹⁶ Payable under Part 3A of the Grants Act

References

Public Ruling	Issued	Dates of effect	
		From	To
GEN013.1	12 June 2026	<ul style="list-style-type: none">• 15 December 2025 (for Boost to Buy Arrangements)• 5 December 2025 (for Help to Buy Arrangements)	Current