



Ms Kris Peach
Chair
Australian Accounting Standards Board
PO Box 204
Collins Street West VIC 8007

Our ref Submission-ED284

3 April 2018

Dear Kris

ED 284 Recent Standards - Reduced Disclosure Requirements

We are pleased to have the opportunity to comment on Exposure Draft 284 *Recent Standards – Reduced Disclosure Requirements* (ED 284).

We broadly support the proposals, as a whole, set out in ED 284. We agree that the current RDR decision-making framework set out in the 'Tier 2 Disclosure Principles' document has been appropriately applied. However, as highlighted in our submission on ED 277 *Reduced Disclosure Requirements for Tier 2 Entities*, we would argue that the minimum disclosures are still too extensive when considering user needs, particularly with respect to the disclosures required for AASB 16 *Leases*.

Please refer to the Appendix for our detailed comments on the specific and general matters for which feedback was requested.

We would be pleased to discuss our comments with members of the AASB or its staff. If you wish to do so, please contact myself on (02) 9455 9744 or Julie Locke on (02) 6248 1190.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Voogt', written over a horizontal line.

Michael Voogt
Director

Appendix

Specific matters for comment

1 Do you agree with the proposed RDR concessions for AASB 16 Leases? If not, please provide reasons.

We agree that the AASB has applied the current RDR framework appropriately to the proposed RDR concessions for AASB 16.

We recommend that both paragraph 57 and Appendix A: *Analysis and Proposal* for paragraph 57 be amended or clarified that the information required by paragraph 77 of AASB 116 *Property, Plant and Equipment* for the right-of-use assets is only required to the extent required by Tier 2 entities – i.e. those sub-paragraphs of AASB 116 paragraph 77 reduced for Tier 2 entities are similarly reduced for this cross-referenced disclosure.

2 Do you agree with the proposed RDR concessions for AASB 1058 Income of Not-for-Profit Entities? If not, please provide reasons.

Given the types of entities that will be applying AASB 1058, we question whether any disclosures should be reduced for Tier 2 entities.

The rationale in the analysis around paragraphs 34 and 36 is that AASB 101 *Presentation of Financial Statements* requires disclosure for sources of estimation uncertainty and therefore any disclosures required by virtue of paragraphs 34 and 36 would be required by AASB 101 in any event. As these disclosures (those in paragraphs 34 and 36) were specifically defined when the Board issued the standard, there was a decision that they would be important in some specific scenario, particularly if the view is that such disclosures would be required by AASB 101 in any event.

Whilst we agree that paragraphs 27 and 37 are only encouraged disclosures, for the types of entities applying the standard, we consider that this would be useful information for users to have. We expect by specifically reducing these disclosures, when they are optional for Tier 1 entities, will result in no Tier 2 entities considering including the disclosures, even when they may be relevant to users of the financial statements.

3 Do you agree that RDR concessions are not required for AASB 1059 Service Concession Arrangements: Grantors? If not, please provide reasons.

We agree that RDR discussions are not required for AASB 1059.



- 4 Do you agree with the proposed effective date of annual periods beginning on or after 1 January 2019 (with early adoption permitted)? If not, please explain why.**

We agree with the proposed effective date of annual periods beginning on or after 1 January 2019 (with early adoption permitted).

- 5 Do you have any other comments on the ED proposals?**

We have no specific comments to add with respect to the request for comment on General matters.