

Mr Kevin Stevenson Chairman Australian Accounting Standards Board PO Box 204, Collins Street WEST VICTORIA 8007 By Email: standard@aasb.gov.au

23 December 2010

Grant Thornton Australia Limited ABN 41 127 556 389

Level 17, 383 Kent Street Sydney NSW 2000 Locked Bag Q800 QVB Post Office Sydney NSW 1230

T +61 2 8297 2400 F +61 2 9299 4445 E info.nsw@au.gt.com W www.grantthornton.com.au

Dear Kevin

AASB ED 205 EXTENDING RELIEF FROM CONSOLIDATION, THE EQUITY METHOD AND PROPORTIONATE CONSOLIDATION

Grant Thornton Australia Limited (Grant Thornton) is pleased to provide the Australian Accounting Standards Board (AASB) with its comments on ED 205 (the ED) and the accompanying Basis for Conclusions.

Grant Thornton's response reflects our position as auditors and business advisers both to listed companies and privately held companies, and public and private businesses, and this submission has benefited with some initial input from our clients, Grant Thornton International, and discussions with key constituents.

We support the proposals given that for Consolidations, the LASB has in its IFRS for SMEs accounting standard allowed relief where there has been compliance with either full IFRS or IFRS for SMEs. For equity accounting the IFRS for SMEs accounting standard allows entities the choice of the cost model so no exemption is needed. We are surprised that the Basis for Conclusions does not mention the IFRS for SMEs authority., and on that basis we see no reason to add any further comment on the AASB's specific matters listed in the ED.

Grant Thornton also believes that the AASB should allow the IFRS for SMEs accounting standard as an option for non-publicly accountable entities in addition to full IFRS or the RDR.

Grant Thornton Australia Limited is a member firm within Grant Thornton International Ltd. Grant Thornton International Ltd and the member firms are not a worldwide partnership, Grant Thornton Australia Limited, logether with its subsidiaries and related entities, delivers its services independently in Australia.

Liability limited by a scheme approved under Professional Standards Legislation

Our Ref: L-241212-AASB ED 205 RELIEF FROM CONSOLIDATION ETC DUE TO RDR



If you require any further information or comment, please contact me.

Yours sincerely GRANT THORNTON AUSTRALIA LIMITED

Å

Keith Reilly National Head of Professional Standards