

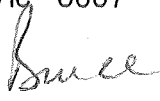
Department of Treasury and Finance

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Mr Bruce Porter
Acting Chairman
Australian Accounting Standards Board
PO Box 204
Collins St West
MELBOURNE Vic 8007

Dear Mr Porter



**PROPOSED INTERPRETATION: AUSTRALIAN SUPERANNUATION CONTRIBUTIONS TAX
FOR DEFINED BENEFIT PLANS**

The Heads of Treasuries Accounting and Reporting Advisory Committee welcomes the opportunity to comment on the Proposed Interpretation *Australian Superannuation Contributions Tax for Defined Benefit Plans*.


HoTARAC does not believe that the Interpretation's consensus will significantly impact the Australian public sector as it is common practice amongst HoTARAC members to allow for contributions tax when measuring a defined benefit obligation. HoTARAC considers the determination of the contribution tax amount to be a more contentious issue than if it should be allowed for.

HoTARAC believes that the clarity of the consensus would be improved if it stated that the impact should be determined after considering other relevant circumstances, such as any offsetting dividend imputations and tax deductions.

HoTARAC is not aware of any regulatory impediments to implementation of the changes. HoTARAC offers no comment about whether the changes are in the best interests of the Australian economy.

Please contact Peter Gibson from the Australian Department of Finance and Deregulation on 02 6215 3551 if you wish to discuss these matters further.

Yours sincerely

A handwritten signature in cursive script that reads "D W Challen".

D W Challen

CHAIR

HEADS OF TREASURIES ACCOUNTING AND REPORTING ADVISORY COMMITTEE

30 March 2009

Contact: David Tadd
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