

6 September 2011

The Chairman
Australian Accounting Standards Board
PO Box 204
Collins Street West
Victoria 8007

Exposure Draft 213 Proposed Amendments to Improvements to IFRSs

Dear Mr Stevenson

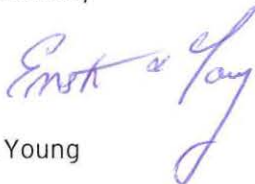
Ernst & Young Australia is pleased to provide our comments on the AASB's Exposure Draft 213 *Improvements to IFRSs*.

Our global organisation are responding directly to the IASB on their questions. We have therefore limited our responses to the additional specific questions raised by the AASB in the Invitation to Comment.

Our responses to these specific questions are set out in the Appendix to this letter.

We would be pleased to discuss our comments further with you. Please contact either Lynda Tomkins (lynda.tomkins@au.ey.com or (02) 9276 9605) or Georgina Dellaportas (georgina.dellaportas@au.ey.com or ((03) 9288 8621) if you wish to discuss any or the matters raised in this response.

Yours sincerely



Ernst & Young

Appendix

1. The AASB has requested comments on each of the proposals outlined in the table below:

AASB Proposal	Ernst & Young Comment	Recommendation
(a) retains the existing Not for Profit entities Aus paragraph in AASB 101 <i>Presentation of Financial Statements</i>	We agree with the AASB proposal.	N/A
(b) amendments to Australian Accounting Standards may be necessary as a result of the proposed clarification on the requirement to apply IFRS 1 for NFP entities	We agree that as Not for Profit entities do not comply with IFRS, they will not be able to make an explicit and unreserved statement of compliance.	The existing paragraph Aus 3.2 will need to be revised.