

22 March 2019

Kris Peach
Chairman and CEO
Australian Accounting Standards Board
PO Box 204
Collins Street West VICTORIA 8007

Dear Kris,

Request for Comment on Fatal Flaw Review of Proposed Standard AASB 2019-X
“Amendments to Australian Accounting Standards – References to the Conceptual
Framework”

Ernst & Young Australia is pleased to comment on the above Fatal Flaw Review. We
welcome the opportunity to contribute to the future of financial reporting in Australia.

Our observations are as follows:

- Interpretation 1019 (Page 35)

Footnote 1 attached to paragraph 18 of this Interpretation still refers to the
Framework for the Preparation and Presentation of Financial Statements (the
Framework). We believe consideration needs to be given to whether this can be
amended to refer to the revised conceptual framework with an AusCF footnote
included for AusCF entities maintaining the reference to the Framework.

We would also expect the inclusion of the AusCF entity definition in this Interpretation.

- Interpretation 1031 (Page 36)

We concur with the inclusion of paragraph AusCF1 to this Interpretation. We would
also expect the same inclusions in other Interpretations (eg Interpretations 20 through
23).

Additionally, there is a reference in paragraph 21 of this Interpretation to the
Framework. We believe consideration needs to be given to whether this can be
amended to refer to the revised conceptual framework with an AusCF footnote
included for AusCF entities maintaining the reference to the Framework.

- Interpretation 1038 (Page 36)

We would expect the AusCF application paragraphs to be added to this Interpretation.

Additionally, there is a reference in paragraph 34 of this Interpretation to the
Framework. We believe consideration needs to be given to whether this can be
amended to refer to the revised conceptual framework with an AusCF footnote
included for AusCF entities maintaining the reference to the Framework.

- Interpretation 1047 (Page 36)

We note paragraph 10 of this Interpretation is not intended to be deleted. We would expect deletion as the application of this Interpretation is covered by paragraph 26 of AASB 1057.

- Interpretation 1052 (Page 37)

There is a reference in paragraph 4 of this Interpretation to the Framework . We believe consideration needs to be given to whether this can be amended to refer to the revised conceptual framework with an AusCF footnote included for AusCF entities maintaining the reference to the Framework.

We would be pleased to discuss our comments further with either yourself or members of your staff. If you wish to do so, please contact Tony Hanrahan on (03) 9635 4036.

Yours sincerely

Ernst & Young