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Dr Keith Kendall  
Chair  
Australian Accounting Standards Board  
PO Box 204  
Collins Street West VIC 8007

Our ref ED 306 Submission

13 January 2021

Dear Dr Kendall

**Exposure Draft 306: Transition Between Tier 2 Frameworks for Not-for-Profit Entities**

We are pleased to have the opportunity to comment on Exposure Draft 306 *Transition Between Tier 2 Framework for Not-for-Profit Entities* (ED 306).

We support the proposals set out in ED 306. We do not believe there is a basis for arguing that the transitional relief should only be available to for-profit entities moving from Tier 2 – Reduced Disclosure Requirements and adopting Tier 2 – Simplified Disclosures. This measure should provide not-for-profit entities with some minor compliance cost relief while not adversely impacting the AASB's financial reporting objectives of improved comparability, consistency and transparency.

In addition, we believe that further relief provided to for-profit entities in AASB 1053 *Application of Tiers of Australian Accounting Standards Appendix E* (distinguishing errors and changes in accounting policies and restating comparative information) should be considered as part of the AASB's project on the not-for-profit financial reporting framework. That is, it should not be made available as part of the changes proposed in ED 306.

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.

Yours sincerely

Michael Voogt  
Director