



Mr Kevin Stevenson
Chairman
Australian Accounting Standards Board
PO Box 204
Collins Street West VIC 8007

via email: standard@asb.gov.au

15 July 2013

Dear Kevin

Re: Exposure draft Tier 2 Supplement to ED 235 *Recoverable Amount Disclosures for Non-Financial Assets*.

We are responding to your request for comments on the Tier 2 Supplement to ED 235 *Recoverable Amount Disclosures for Non-Financial Assets*.

We have provided specific comments on these exposure drafts in Appendix A to this letter.

I would welcome the opportunity to discuss our firm's views at your convenience. Please contact me on (02) 8266 7104 if you would like to discuss our comments further.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'P. Shepherd', is written over the typed name.

Paul Shepherd
Partner, PricewaterhouseCoopers
paul.a.shepherd@au.pwc.com
T: +61 (2) 8266 7104

PricewaterhouseCoopers, ABN 52 780 433 757
Darling Park Power 2, 201 Sussex Street, GPO BOX 2650, SYDNEY NSW 1171
DX 77 Sydney, Australia
T +61 2 8266 0000, F +61 2 8266 9999, www.pwc.com.au

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Appendix A – Specific matters for comment

1. Do you agree with the AASB disclosure proposals regarding the proposed new disclosures in paragraph 130 of IAS 36 in relation to Tier 2 entities as set out in the Proposed Reduced Disclosure Requirements section?

We agree that the proposals in the exposure draft are consistent with the objective of the reduced disclosure regime to significantly reduce the disclosure burden and cost of preparing and auditing general purpose financial statements for Tier 2 entities.

2. Are there any regulatory issues or other issues arising in the Australian environment that may affect the implementation of these proposals, particularly any issues relating to (a) not-for-profit entities and (b) public sector entities?

We do not believe that there are any regulatory or other issues that would affect implementation of the proposals in Australia.

3. Overall, would the proposals result in financial statements that would be useful to users?

We believe that the proposals would result in financial statements that are useful to users.

4. Are the proposals in the best interests of the Australian economy?

The introduction of the reduced disclosure regime has significantly reduced the regulatory burden for those entities that are eligible to report under Tier 2 of the new regime. It is therefore in the best interests of the Australian economy if new standards provide consistent disclosure relief for Tier 2 entities on a timely basis.