

19 January 2005

The Secretary,  
Parliamentary Joint Committee on Corporations and Financial Services,  
Suite SG.64  
Parliament House  
CANBERRA ACT 2600

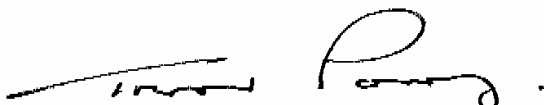
Dear Sir,

PKF is pleased to make the following submissions to the Parliamentary Joint Committee in respect of the implementation of IFRSs in 2005.

1. PKF does not support delaying the implementation of any of the AASB Standards for 2005 because:
  - 1.1 Much work has already been accomplished by Australian companies in preparing for the transition in 2005.
  - 1.2 It is unlikely that most small and medium sized Australian companies will need to establish new or complex systems to produce IFRSs compliant financial statements. Apart from new disclosures the impact on most small to medium sized Australian companies of changes in recognition and measurement accounting policies is not likely to be significant.
  - 1.3 There would be little benefit in delaying the transition and delay would have a detrimental effect on companies which have allocated scarce resources by unnecessarily drawing out the transition process.
2. PKF does not support the proposal that relief from the provision of comparative information should be given to non-listed entities because:
  - 2.1 As stated under 1 above, for most small to medium sized Australian companies the impact of IFRSs is not likely to be significant.
  - 2.2 Companies are already preparing to supply comparative information which properly completes the reporting process under IFRS.
3. PKF supports the harmonisation of AASB 1046 "Director and Executive Disclosures" with the CLERP 9 Director and Executive Remuneration Disclosures.

Please contact the undersigned should you require further information.

Yours faithfully,



Trevor Parry  
Director Professional Standards.