23 June 2010

Sir David Tweedie  
Chairman  
International Accounting Standards Board  
30 Cannon Street  
LONDON EC4M 6XH  
United Kingdom

Email: CommentLetters@iasb.org

Dear Sir David


Thank you for the opportunity to comment on the IASB Exposure Draft ED/2010/2 Conceptual Framework for Financial Reporting: the Reporting Entity. CPA Australia, the Institute of Chartered Accountants in Australia (the Institute), and the National Institute of Accountants (the Joint Accounting Bodies) have considered ED/2010/2 and our comments follow.

The Joint Accounting Bodies of Australia represent over 180,000 professional accountants. Our members work in diverse roles across public practice, commerce, industry and academia throughout Australia and internationally.

The Joint Accounting Bodies support the principles set down in the exposure draft, but suggest that further consideration of the role of users of financial reports would assist in determining the boundaries of the reporting entity.

The current proposals are an improvement on the preliminary views paper on the reporting entity, issued in 2008. In particular we congratulate the boards on taking up constituents' comments recommending that some of the detail be moved to an accounting standard on consolidation and describing the area of activity as economic rather than business activity.

Our detailed comments in response to the IASB's questions are attached.

If you require further information on any of our views, please contact Mark Shying, CPA Australia, Mark.Shying@cpaaustralia.com.au, Kerry Hicks, the Institute, kerry.hicks@charteredaccountants.com.au, or Tom Ravlic, the National Institute of Accountants, tom.ravlic@nia.org.au.

Yours sincerely,

[Signatures]

Alex &  
Chief Executive Officer  
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Institute of Chartered Accountants in Australia

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National Institute of Accountants

Representatives of the Australian Accounting Profession

[Logos]
1 Do you agree that a reporting entity is a circumscribed area of economic activities whose financial information has the potential to be useful to existing and potential equity investors, lenders and other creditors who cannot directly obtain the information they need in making decisions about providing resources to the entity and in assessing whether the management and the governing board of that entity have made efficient and effective use of the resources provided? (See paragraphs RE2 and BC4–BC7.) If not, why?

We agree with this definition, but note that it would require broadening for use outside the for-profit private sector.

Paragraph RE2 picks up on the objective of financial reporting dealt with in the draft of Chapter 1 of the Conceptual Framework, i.e. ‘to provide financial information about the reporting entity that is useful to present and potential equity investors, lenders and other creditors in making decisions in their capacity as capital providers’ (referred to in this submission as ‘the users’). We would like to see some expansion on this comment on the needs of users for financial information, because consideration of the users assists in determining the boundaries of the reporting entity. Once the users have been established, the control criterion is then used to establish the boundaries of the economic entity to be reported on. For example, the existence of external shareholders at an intermediate level in a consolidated group would indicate the need for sub-consolidation of a reporting entity preparing general purpose financial statements at the level of these intermediate external shareholders as well as at ultimate holding company level.

Paragraph RE3 expands on the three elements of the definition of a reporting entity in paragraph RE2. We consider it is therefore inconsistent to then state that when these three elements are present, it is not always sufficient to identify a reporting entity.

As currently drafted, it could be argued that a reportable segment might satisfy the criteria for being a reporting entity, in that per paragraph RE4 “it can be a portion of a single entity”. A focus on users would assist here in making it clear that a reportable segment or other portion of an entity for which there is no separate user group is not a reporting entity as it has no reason to report, unless legislation or regulations require the preparation of general purpose financial statements at that level.

Paragraph RE6 considers that a prospective purchaser of a division could be a user as described in paragraph RE2. We do not find this example helpful as a prospective purchaser would be carrying out additional due diligence procedures prior to purchasing the assets or division and would be requiring specific information for a particular purpose. Such a branch or division would not normally be a reporting entity as discussed in the paragraphs above, although it might perhaps form a reportable segment. Further, case law in Australia limits the ability of prospective purchasers to rely on the acquiree’s annual report without permission from the auditor.

We consider that the insertion of a definition of entity would also assist with the delineation of the reporting entity and the confusion displayed in paragraph RE6, as noted above. Statement of Accounting Concepts 1 The Definition of the Reporting Entity, an Australian specific concept statement, defines an entity as ‘any legal, administrative or fiduciary arrangement, organisational structure or other party (including a person) having the capacity to deploy scarce resources in order to achieve objectives’. An economic entity is then defined as ‘a group of entities comprising a controlling entity and one or more controlled entities operating together to achieve objectives consistent with those of the controlling entity’. These two definitions in our view achieve the same end as that proposed by the IASB but are clearer than paragraphs RE2 to RE5.
2  Do you agree that if an entity that controls one or more entities prepares financial reports, it should present consolidated financial statements? Do you agree with the definition of control of an entity? (See paragraphs RE7, RE8 and BC18–BC23.) If not, why?

We agree with this proposal and the rationale in BC18–BC23.

3  Do you agree that a portion of an entity could qualify as a reporting entity if the economic activities of that portion can be distinguished from the rest of the entity and financial information about that portion of the entity has the potential to be useful in making decisions about providing resources to that portion of the entity? (See paragraphs RE6 and BC10.) If not, why?

We consider that paragraph RE6 leads to difficulties in ascertaining where the boundaries of the reporting entity lie. Greater focus on the needs of users would help to delineate the boundaries of the reporting entity and examples such as the following would assist. Where a group contains a partially owned subsidiary, the external stakeholders are interested in that entity and any sub-consolidation it may need to produce to make economic decisions about their investment in that subgroup. Similarly, there may be instances where an entity within a group needs to report separately for prudential reporting reasons, for example where there is an insurance company within a diversified group. However, generally, in the absence of any legal requirement to the contrary, a branch or division that is not a separate entity and has no external users would not be a reporting entity in its own right, but might be a reportable segment.

As discussed in our response to Question 1 we consider the example in paragraph RE6 to be misleading, as an investor considering purchasing a branch or division of a reporting entity would perform his or her own due diligence investigations. We further consider that a financial report produced for this purpose would be a tailor-made report prepared for the needs of the potential purchaser.

4  The IASB and the FASB are working together to develop common standards on consolidation that would apply to all types of entities. Do you agree that completion of the reporting entity concept should not be delayed until those standards have been issued? (See paragraph BC27.) If not, why?

This proposed concept statement is now sufficiently high level not to interfere with the subsequent publication of a detailed consolidation standard. In our view it can be published now.