



Chief Executive Officer
Accounting Professional & Ethical Standards Board Limited
Level 11, 99 William Street
Melbourne VIC 3000
Australia

via email: sub@apesb.org.au

8 August 2022

APES 205: Conformity with Accounting Standards

We welcome the opportunity to provide comments on the proposed revisions to APES 205 Conformity with Accounting Standards.

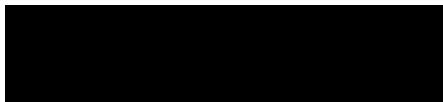
We agree that the entity types listed in proposed paragraph 6.2 of APES 205 should be excluded from the scope and are not aware of any additional entities which should be scoped out of the Special Purpose Financial Statements (SPFS) disclosure requirements in APES 205.

We also agree that subparagraphs 6.1(b) and (c) do not need to be aligned with the AASB's SPFS disclosure requirements. While aligning the requirements would create consistency, we believe this is not necessary as preparers of SPFS applying APES 205 are not required to comply with Australian Accounting Standards, and therefore, do not apply the provisions of AASB 1054 *Australian Additional Disclosures*.

However, we do recommend replacing the term 'significant' with the term 'material' in subparagraph 6.1(c) of APES 205, consistent with the changes made by AASB 2021-2 *Amendments to Australian Accounting Standards - Disclosure of Accounting Policies and Definition of Accounting Estimates*. Amending the terminology to *material* will remove the ambiguity associated with the undefined term 'significant', enabling preparers to refer to the materiality concepts in the AASBs and provide them with a framework to determine which policies should be disclosed. It will also avoid any confusion that could arise as a result of the different terminology being used.

Should you need any further information, please feel free to contact myself on the number below or Meina Rose on 0432 320 540.

Yours sincerely



Jan McCahey
PwC Australia Partner
Mobile: 0407 928635
Email: jan.mccahey@pwc.com

PricewaterhouseCoopers, ABN 52 780 433 757
One International Towers Sydney, Watermans Quay, Barangaroo NSW 2000, GPO BOX 2650 Sydney NSW 2001
T: +61 2 8266 0000, F: +61 2 8266 9999, www.pwc.com.au
Level 11, 1PSQ, 169 Macquarie Street, Parramatta NSW 2150, PO Box 1155 Parramatta NSW 2124
T: +61 2 9659 2476, F: +61 2 8266 9999, www.pwc.com.au

Liability limited by a scheme approved under Professional Standards Legislation.