

24 September 2024

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

Submitted online: <https://apesb.org.au/review-of-apes-220-taxation-services/>

Dear Channa,

Re: Exposure Draft 02/24 Proposed Standard: APES 220 Taxation Services

Thank you for the opportunity to comment on Exposure Draft 02/24. IPA supports the range of proposed amendments to APES 220 *Taxation Services* to:

- incorporate proposed Tax Planning and Related Services amendments to APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* (APES 110)
- incorporate conforming amendments to align with APES 110
- update references to APES 320 *Quality Management for Firms that provide Non-Assurance Services*
- address matters on the Issues Register relating to confidentiality and supervision arrangements for tax lodgement services.

IPA also supports the proposed effective date of 1 July 2025, with earlier adoption permitted.

Other Matter

We note that paragraph 1.7 of APES 220 states that “the Standard is not intended to detract from any responsibilities which may be imposed by law or regulation”. Consistent with this objective, in order to ensure consistency between APES 220 and the *Tax Agents Services Act 2009* (TASA) ecosystem, including Ministerial Directions which may be issued from time-to-time, APESB should undertake periodic reviews of APES 220 to ensure requirements align with the legislative framework applicable to registered BAS/tax practitioners.

If you have any queries with respect to our comments or require further information, please do not hesitate to contact Erik Hopp at erik.hopp@publicaccountants.org.au or on 03 8665 3144.

Yours sincerely



Vicki Stylianou
Group Executive, Advocacy & Professional Standards
Institute of Public Accountants