

29 May 2025

Carolyn Cordery
Chair, New Zealand Accounting Standards Board
External Reporting Board
Level 6, Featherston Street
Wellington 6011

Via online submission: <https://www.xrb.govt.nz/consultations/accounting-standards-open-for-consultation/rdr-concessions-nz-ifs-18/>

Dear Carolyn

Consultation and Exposure Draft: RDR Concessions – NZ IFRS 18 Presentation and Disclosure in Financial Statements

CPA Australia and Chartered Accountants Australia and New Zealand (CA ANZ) represent over 310,000 professional accountants who work in diverse roles across public practice, commerce, industry, government and academia throughout Australia, New Zealand and internationally. We welcome the opportunity to provide feedback on the above Consultation and Exposure Draft. We make this submission on behalf of our members and in the public interest.

CPA Australia and CA ANZ support the concessions for Reduced Disclosure Requirements (RDR) for Tier 2 for-profit entities under proposed amendments to NZ IFRS 18 Presentation and Disclosure in Financial Statements (NZ IFRS 18) and NZ IAS 34 Interim Financial Reporting (NZ IAS 34). Feedback we received from our members is consistent with paragraph NZ BC1 of the Basis for Conclusions accompanying NZ IFRS 18 and NZ IAS 34 that it is not expected that Tier 2 entities would issue public communications that include management-defined performance measures (MPMs) as defined in NZ IFRS 18, because they do not have public accountability. No other RDR concessions that should be made to NZ IFRS 18 were highlighted by our members.

Should you have any questions or wish to discuss further, please contact either Ram Subramanian at ram.subramanian@cpaaustralia.com.au (CPA Australia) or Amir Ghandar at amir.ghandar@charteredaccountantsanz.com (CA ANZ).

Yours sincerely

Elinor Kasapidis

Chief of Policy, Standards and External Affairs
CPA Australia

Simon Grant FCA

Group Executive – Advocacy and International Development
Chartered Accountants Australia and New Zealand