

Monday, 1 December 2025

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External Reporting Board
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By email: <a href="mailto:accounting@xrb.govt.nz">accounting@xrb.govt.nz</a>

Dear Carolyn

#### Exposure Drafts ED PBE IPSAS 47 Revenue and ED PBE IPSAS 48 Transfer Expenses

Chartered Accountants Australia and New Zealand (CA ANZ) welcomes the opportunity to provide feedback to the External Reporting Board (XRB) on the above two Exposure Drafts. We make this submission on behalf of our members and in the public interest. For clarity and context, CA ANZ does not prepare financial statements in accordance with the PBE Standards – we have answered the questions based on what we have heard from members and other stakeholders who do apply the PBE Standards.

We recognise that the EDs include fundamental changes to the accounting for revenue and transfer expenses, therefore the educational materials and additional consultation timeframe are useful. However, we are concerned about what appears to be a lack of engagement with this consultation, especially from the not-for-profit (NFP) sector. This could be a symptom of the NFP sector facing funding reallocations, increased applications for funding, and pressure on income streams, as noted by the <a href="External Reporting Advisory Panel">External Reporting Advisory Panel</a> (XRAP) of which we are a member. These sentiments are echoed by our <a href="Charities and Not-For-Profit Advisory Committee">Committee</a>. We are also on the <a href="Charities Sector Group">Charities and Not-For-Profit Advisory</a> Committee. We are also on the <a href="Charities Sector Group">Charities and Not-For-Profit Advisory</a> Committee. We are also on the <a href="Charities Sector Group">Charities Sector Group</a>, members of which have expressed significant consultation fatigue this year.

We are therefore of the view that, if the XRB does proceed to implement these proposed standards in New Zealand, there will need to be a significant awareness raising campaign and education programme to support that process particularly for the NFP sector.

#### **Key points:**

- We have heard concerns about the costs involved in adopting proposed PBE IPSAS 47
   Revenue (PBE IPSAS 47) and moving to a brand-new revenue recognition model.
   However, on balance, we consider that the long-term benefits of a more consistent and comparable revenue recognition model make this an acceptable trade-off.
- Our stakeholders also have significant concerns relating to the cost and complexity of the
  proposed PBE IPSAS 48 *Transfer Expenses* (PBE IPSAS 48) and are of the view that
  the benefits would not outweigh the costs, particularly in the NFP sector. We urge the
  XRB to complete a strategic review of user needs and cost-benefit considerations for ED
  PBE IPSAS 48 in both the public and the NFP sector prior to any final decision regarding
  its adoption as we believe the cost-benefit trade-off in each sector may be different.
- We also support the XRB's planned field testing of both EDs as one way to assess the cost versus benefit impact of adopting the proposed standards. We recommend the field testing for ED PBE IPSAS 47 focuses on the cost-benefit relating to the application of the key principles (as discussed in our response to question 2 and 5a in Appendix A). For ED PBE IPSAS 48, we suggest that the cost-benefit analysis be more holistic to include an evaluation of user needs, information relevance, costs and practicality in both the public and the NFP sectors (as discussed in our response to question 1c in Appendix C).
- We also consider that implementation working groups should be established to support
  the implementation of PBE IPSAS 47 and PBE IPSAS 48 if the XRB chooses to adopt
  the standards.

Our detailed responses to the specific questions raised in the consultation documents are contained in **Appendix A** for ED PBE IPSAS 47 and **Appendix B** for ED PBE IPSAS 48. **Appendix C** provides more information about CA ANZ. Should you have any queries about the matters in this submission, or wish to discuss them in further detail, please contact Amir Ghandar, Reporting and Assurance Leader by email; <a href="mailto:amir.ghandar@charteredaccountantsanz.com">amir.ghandar@charteredaccountantsanz.com</a>.

Yours sincerely

**Peter Vial FCA** 

New Zealand Country Head

**Amir Ghandar FCA** 

Reporting and Assurance Leader

## **Appendix A**

# Responses to specific questions in Consultation Document – PBE IPSAS 47 Revenue

Benefit vs cost consideration (Section D)

1a. What are the anticipated benefits of adopting the proposed PBE IPSAS 47 for your organisation? Please provide specific examples.

Feedback from our stakeholders indicates that the anticipated benefits of adopting the proposed PBE IPSAS 47 include:

- Removal of the exchange/non-exchange distinction: The current standards require
  distinguishing between exchange and non-exchange transactions; a process often seen
  as subjective, inconsistent, and difficult to apply. This leads to diversity in practice and
  reduced comparability. The proposed PBE IPSAS 47 brings revenue accounting
  requirements into a single standard, which simplifies classification.
- Close alignment with NZ IFRS 15 Revenue from Contracts with Customers (NZ IFRS 15):
   The proposed PBE IPSAS 47 aligns closely with NZ IFRS 15, the standard on revenue recognition which applies to for-profit entities. This alignment enhances comparability across sectors, reduces consolidation adjustments for mixed groups, and supports uniform accounting policies for similar transactions, improving clarity and consistency.
- International alignment and workforce mobility: Harmonisation with international standards facilitates global comparability of financial statements and enables greater mobility for accounting professionals across sectors and jurisdictions.
- Deferral of revenue: The proposed standard allows for deferral of revenue for both transactions with and without binding arrangements. This overcomes limitations in the current standards that restrict deferrals. It also provides a more accurate reflection of revenue earned, performance and obligations over time. As a result, users of financial statements can better understand the financial implications of such arrangements.
- Synergies: Additional benefits may be realised through PBEs gaining a better
  understanding of their revenue transactions and associated arrangements, as well as
  improved quality, comparability and usefulness of financial information for preparers and
  users.

# 1b. What are the anticipated initial and ongoing costs your organisation may incur in adopting the proposed PBE IPSAS 47? Please provide specific examples.

Overall, our stakeholder feedback indicates that the initial and ongoing costs are expected to be significant for most PBEs. This is because the proposed PBE IPSAS 47 involves significantly different core principles to revenue recognition than the current accounting requirements. Entities will need to review all existing arrangements individually to assess whether a binding arrangement exists and, if so, what compliance obligations arise. On an ongoing basis, entities will then be required to review all new arrangements and any changes to existing arrangements to assess whether a change in accounting treatment is needed.

As PBEs upgrade grant documentation, reporting systems and software to implement these requirements, it is expected that the initial costs will be the most significant. For an implementation project of this size and nature, we would expect some ongoing costs as adjustments and updates to reporting systems may also be needed. Staff and consultants' costs will likely be higher initially as part of the transition, including training and education needs as part of implementation.

Based on the for-profit sector's experience with the implementation of NZ IFRS 15, the initial costs to implement the disclosure requirements are likely to be considerable. The ongoing costs varied depending on the nature of the entity's operations, contracts and accounting systems. The volume, diversity and complexity of revenue contracts were the main drivers of these ongoing costs. We expect that the same cost drivers will impact on the variability of PBEs' ongoing costs.

# 1c. Considering the benefits and costs identified above, do you expect the benefits of adopting PBE IPSAS 47 to outweigh the costs for your organisation? Please explain your reasoning.

As noted in our response to question 1(b) above, there are concerns about the costs involved in adopting PBE IPSAS 47. However, on balance, we consider that the long-term benefits of more consistent and comparable revenue recognition in the PBE sector make this an acceptable trade-off.

However, we expect that the costs and benefits for public sector and NFP entities are likely to be different and need to be separately considered before the implementation is progressed. We therefore commend the XRB for inviting preparers to participate in field testing of the proposed PBE IPSAS 47. We agree that field testing could provide useful information about costs and benefits prior to the standard being effective and inform the XRB's planned adoption and implementation approach.

#### **Key principles for revenue accounting (Section F)**

2. Do the binding arrangement, enforceability and compliance obligation principles outlined in the ED provide sufficient clarity for practical application? What challenges, if any, do you anticipate in applying these principles in practice?

Based on the experience of our members, we understand it is often challenging to determine whether there is a "binding arrangement". A binding arrangement is defined in paragraph 4 of the ED as "an arrangement that confers both rights and obligations, enforceable through legal or equivalent means, on the parties to the arrangement." Therefore, the existence of a binding arrangement is underpinned by the principle of enforceability which may involve significant judgement.

Paragraph AG16 states that an arrangement is "enforceable" if it includes clearly specified rights and obligations for each involved party and remedies for non-completion by each involved party which can be enforced through the identified enforcement mechanisms. Some of our members have advised that the arrangements to which PBEs are parties may not be sufficiently specific about the rights and obligations. This may result in circumstances where it is unclear whether there is a binding arrangement, and if so, how its rights and obligations should be accounted for.

Paragraph 14 asserts that a binding arrangement can be written, oral or implied by an entity's customary practices. Preparers have advised that it could be very challenging to provide sufficient appropriate audit evidence for an oral arrangement, and an implied arrangement may be judgemental for similar reasons. This lack of clarity may also hinder the practical ability to determine the enforceability of such terms.

Overall, the broad overarching revenue recognition principles could lead to diversity in application because of the different judgements such as whether there is a binding arrangement (i.e. whether the arrangement is "enforceable"), when compliance obligations are satisfied or whether there are 'other' obligations.

#### Revenue recognition (Section G)

3. Do you agree with the proposed approach to revenue recognition for transactions without binding arrangements? Are there any specific challenges you foresee in applying this approach?

We agree with the proposed approach to revenue recognition for transactions without binding arrangements which allows for deferral of revenue in certain circumstances, which can provide more useful information to stakeholders. However, the use of different terms; "obligation" and "enforceable obligation" in paragraphs 29(a) and 29(b) respectively has caused confusion as to what the distinction is and if there is meant to be one. We recommend this terminology is clarified by using consistent terminology to the discussion in the <a href="PBE Conceptual Framework">PBE Conceptual Framework</a> on the definition of a liability in paragraphs 5.14-5.26. The

challenges are compounded by the application guidance, implementation guidance and illustrative examples being focused on transactions with binding arrangements.

4. Do you agree with the proposed approach to revenue recognition for transactions with binding arrangements? Are there any specific challenges you foresee in applying this approach?

We agree with the proposed approach to revenue recognition for transactions with binding arrangements.

However, given judgement is critical to assess whether enforceability exists, some classification inconsistencies should be expected and the issue of a lack of comparability could continue. In our view, transition will be a significant challenge for the PBE sector, based on the experience in the for-profit sector.

#### Implementation and specific issues (Section H)

5a. What challenges do you anticipate in implementing PBE IPSAS 47, including any specific transactions or scenarios where additional clarification may be needed?

We have a general concern about the ability of preparers and auditors to understand and consistently apply the proposed requirements in the ED due to its length and complexity. Given that some PBEs are required to evaluate their revenue transactions based on various, different agreements, this could seriously challenge a resource-constrained sector.

We are also concerned that there are few illustrative examples specifically relating to revenue transactions without a binding arrangement, which are likely to be very common. Illustrative examples could focus on determining when an entity has satisfied its obligations over time, like paragraphs 92 and 93 relating to binding arrangements satisfying compliance obligations over time.

We expect that applying the transitional provisions would be time consuming and complex for some PBEs because there could be technical accounting and legal skills required to identify the existence of a binding arrangement, and compliance obligations, which underpin the new revenue recognition model. Hence, we support field testing prior to implementation to ensure any issues are identified and addressed by way of variations to the transitional provisions if needed.

#### 5b. What support or guidance would be most helpful to assist with these challenges?

We welcome the extensive application guidance, implementation guidance and 56 illustrative examples which we believe will assist. However, we note that there are only two illustrative examples covering transactions without binding arrangements (Example 8 and Example 35 Case A1) which appears unbalanced. In addition, in the illustrative examples covering transactions with binding arrangements, more on the thought process or rationale for the

judgements in step one (confirm binding arrangement model criteria are met) and step two (identify compliance obligations) of the five-step revenue recognition model would be welcomed.

The implementation guidance, which includes the illustrative examples, could also be supplemented with recorded webinars to cover educational content that may assist. In this instance, there may also be a strong case to establish an implementation working group to support preparers and auditors in their transition to PBE IPSAS 47.

There will need to be a significant awareness raising campaign and education programme to support the implementation process, particularly for the NFP sector.

#### Disclosures and RDR concessions (Section I)

# 6. Do you consider the disclosure requirements in PBE IPSAS 47 to be appropriate and proportionate to the needs of users of PBE financial statements?

In relation to services in-kind that are not recognised, it is not logical that the disclosure requirements for Tier 1, qualitative disclosures are *strongly encouraged* (ED paragraph 175) are less than those for Tier 3, where qualitative disclosures are *required* by <u>paragraph A222</u>.

Disclosure of qualitative information about services in-kind is critical to provide transparency as to how reliant on volunteer services the PBE sector is, and it would better facilitate policy decisions. This is particularly so for those entities where without volunteers, the government would need to step in (e.g. essential services such as ambulance and fire).

### 7. Do you agree with the proposed reduced disclosure regime (RDR) concessions for Tier 2 PBEs?

There is a proposed RDR concession in relation to services in-kind that are not recognised. Consistent with our response to question 6, it is not logical that there are *no* disclosure requirements for Tier 2 entities (ED paragraph 175), when qualitative disclosures are *required* for Tier 3 entities (paragraph A222).

#### Mandatory date and other comments (Section J)

#### 8. Do you agree with the proposed mandatory date of 1 January 2029?

Some PBEs may find transition a difficult and time-consuming exercise, and we expect the NFP sector may require additional support, so we agree that the XRB should provide a longer than normal lead time for entities to transition.

The transition to PBE IPSAS 47 involves a completely new revenue recognition model which may be complex to implement. The nature of the transitional provisions including the need to evaluate the practical expedients may also challenge smaller Tier 2 PBEs.

#### 9. Do you have any other comments on the ED?

#### **Transitional provisions**

There is no prospective application transition option for the proposed PBE IPSAS 47 like there is for proposed PBE IPSAS 48. We acknowledge the rationale as to why this may be, such as the potential impact on comparability, added complexity, and other reasons. However, we suggest it be permitted as an option to alleviate the significant initial costs associated with reviewing all existing arrangements. This is on the basis that it is not likely to have a major impact due to:

- The impact on the timing and amount of revenue recognition may be minimal for many PBEs.
- The move away from multi-year funding arrangements.

#### Minor editorials

Paragraph BC13 refers to "Implementation Guidance *Appendix* G" – we believe this should be "Implementation Guidance *Section* G".

## **Appendix B**

Responses to specific questions in Consultation Document – PBE IPSAS 48 Transfer Expenses

#### Benefit vs cost consideration (Section D)

1a. What are the anticipated benefits of adopting the proposed PBE IPSAS 48 for your organisation? Please provide specific examples.

We have concerns that the anticipated benefits of adopting the proposed PBE IPSAS 48 outlined in the consultation paper are being overstated. Our reasons for this view are set out below:

- Fills the current gap in PBE Standards: While there is currently no PBE Standard addressing the accounting for transfer expenses, there does not appear to be wide-spread demand for such a standard. We understand there is some divergence in practice in the public sector, but this appears to be largely limited to social benefit transactions. Overall, user needs appear to be met by information currently provided. It is unclear if the proposed PBE IPSAS 48 would improve the information provided to users of PBE financial reports or promote higher quality financial reporting by PBEs in New Zealand.
- Guidance on challenging accounting issues: Proposed PBE IPSAS 48 allows the deferral
  of expenses for transactions with binding arrangements, which may be a desirable
  accounting outcome for certain entities and therefore is considered a benefit. However,
  we are concerned that the proposed PBE IPSAS 48 could influence how transactions
  happen, e.g. designed to achieve a preferred accounting outcome, which is not the
  purpose or objective of accounting standards.
- Consistency across the PBE sectors: In our view, it is not imperative that there is a
  consistent framework for transfer expense recognition for all PBEs. We do not foresee
  any major issues if proposed PBE IPSAS 48 were applicable for public sectors entities
  prior to it being adopted for NFPs in New Zealand to allow time for more comprehensive
  field testing to be conducted for this sector.
- Coherence: While the core principles of proposed PBE IPSAS 48 are consistent with
  those of proposed PBE IPSAS 47, there are differences in terminology. For example,
  proposed PBE IPSAS 47 uses the terms resource recipient and resource provider (noting
  that the term "resource recipient" is not defined). These are similar, but not identical, to
  those used in proposed PBE IPSAS 48, which are transfer recipient and transfer
  provider. The distinction between the terminologies is unclear and could be confusing
  given the two EDs are essentially referring to the same parties.

# 1b. What are the anticipated initial and ongoing costs your organisation may incur in adopting the proposed PBE IPSAS 48? Please provide specific examples.

Our stakeholders have identified significant concerns relating to the initial and ongoing costs of ED PBE IPSAS 48 as follows:

- PBE IPSAS 48 introduces new judgements, the complexity of which will vary by entity depending on the nature and volume of transactions. For example, PBE IPSAS 48 permits the recognition of a transfer right asset if there is a binding arrangement and funds are transferred up front a significant change to the current accounting treatment. The recognition of a transfer right asset, and subsequent derecognition (and recognition of a transfer expense) as or when the transfer recipient satisfies its obligations, introduces complexity due to its subjectivity, which is likely to be time consuming.
- Under the retrospective application transition option, PBEs would need to reassess all
  existing arrangements which could be a resource intensive and hence costly exercise
  initially. The extent of which would depend on the number of individual arrangements a
  PBE has in place, but could be significant for certain types of NFPs, such as grant
  making organisations.
- Ongoing costs would likely persist as PBEs continually have to assess new or revised arrangements.
- There would be a significant ongoing cost related to the transfer provider implicitly being required to 'monitor' or 'track' the transfer recipient's satisfaction of its obligations under a binding arrangement. This may require transfer providers to implement and resource a whole new system, process and controls.
- Current grant acquittal / accountability reporting might not provide the necessary information for the transfer provider's financial reporting, and therefore necessitate a whole new system, process and controls for additional discrete reporting for transfer recipients.
- Challenges for auditors in obtaining sufficient appropriate audit evidence over the transfer provider's accounting treatment.
- These challenges are likely to be exacerbated for NFPs given potential resource constraints. There are also the opportunity costs whereby these scarce resources are redirected from the delivery of critical goods and services.
- 1c. Considering the benefits and costs identified above, do you expect the benefits of adopting PBE IPSAS 48 to outweigh the costs for your organisation? Please explain your reasoning.

Feedback from our stakeholders is that it is not clear that the proposed PBE IPSAS 48 would better meet the needs of PBE user groups as a whole. Therefore, it is not clear that the benefits of adopting PBE IPSAS 48 would outweigh the costs.

The costs and benefits for public sector and NFP entities are likely to be different so there may be a need to consider them separately. Therefore, we commend the XRB for inviting preparers to participate in field testing the proposed PBE IPSAS 48. Such field testing would provide useful information about costs and benefits which we believe is needed prior to adoption of the standard, particularly for NFPs in New Zealand. If this identifies a need to delay the adoption of proposed PBE IPSAS 48 for NFPs in New Zealand, and for public sector entities to go first, then this is an acceptable outcome in our view.

#### Key principles in transfer expense accounting (Section E)

2. Do the binding arrangement, enforceability and transfer right principles outlined in the ED provide sufficient clarity for practical application? What challenges, if any, do you anticipate in applying these principles in practice?

Conceptually we support the proposed accounting treatment for transfer expenses. Given the key principles for transfer expenses accounting are aligned to the key principles for revenue accounting, our stakeholders are of the view that the same challenges are likely to be encountered. Like ED PBE IPSAS 47, in practice, it is likely to be challenging to assess whether there is a binding arrangement because of the subjectivity involved in assessing elements of enforceability. Transfer providers may also find it challenging to identify the number of distinct transfer rights in the binding arrangement in order to ensure appropriate transfer expense recognition when (or as) the transfer recipient satisfies its obligations.

Due to information asymmetry and judgements involved, there is no practical method by which it can be established that both the transfer recipient and transfer provider have arrived at the same conclusions in recognising revenue and transfer expenses respectively. Although transaction mirroring is not required, this asymmetry may cause challenges in intragroup situations when preparing consolidated financial statements.

#### Recognition of transfer expense transactions (Section F)

3. Do you agree with the proposed approach to transfer expense recognition for transactions with binding arrangements? Are there any specific challenges you foresee in applying this approach?

We agree in theory with the proposed approach for transfer expenses with binding arrangements. However, we foresee several practical challenges arising from the transfer provider being implicitly required to 'monitor' or 'track' the transfer recipient's satisfaction of obligations in a binding arrangement. These are outlined as follows:

 Practical difficulties surrounding the transfer provider's ability to obtain information about the transfer recipient's satisfaction of its obligations. This may necessitate the development of new systems, processes and controls in excess of what is currently required under grant acquittal arrangements in order to provide the necessary evidence to support the judgements being made. Such new systems may require a significant investment of time and resources.

- The above practicalities are exacerbated in cases where the obligation has a significantly long timespan and/or is delivered in a form that is difficult to monitor e.g. services.
- The auditor of the transfer provider's financial statements will need to be satisfied with the sufficiency and appropriateness of audit evidence that supports the transfer right asset and again current grant acquittal arrangements may not be adequate.
- Delays in preparation of the transfer provider's financial statements due to delays in availability and/or provision of information by the transfer recipient.

We also are concerned that paragraph AG39 which states: "If the entity cannot reliably estimate the transfer recipient's progress towards complete satisfaction of its obligations, the transfer right asset shall be expensed immediately" will be used as a means to avoid ongoing 'monitoring' or 'tracking' of the transfer recipient's satisfaction of distinct obligations in a binding arrangement and for transfer providers to continue with their current grant acquittal arrangements.

- 4. Regarding the proposed approach to transfer expense recognition for transactions without binding arrangements:
  - (a) Do you agree with the proposed approach? Are there any specific challenges you foresee in applying this approach?
  - (b) Do you anticipate a change to the accounting for social benefit transactions as a result of applying the proposed approach? If so, how would the accounting change?
  - (c) Do you consider the proposed guidance, added to PBE IPSAS 19, to be sufficient to assist PBEs in determining whether they have a legal or constructive obligation at the reporting date?
- (a) We agree in principle with the proposed approach for transfer expenses without binding arrangements. Transfer providers may experience some challenges in first determining whether or not a provision exists i.e. whether they have a legal or constructive obligation to transfer resources, as this can be judgemental.
- (b) Consistent with the consultation paper; we understand central and local government entities have developed their own accounting policies when accounting for social benefit transactions, based on the requirements within PBE IPSAS 19. Since the proposed PBE IPSAS 48 requires a transfer provider to consider first whether there is a provision under PBE IPSAS 19, we do not expect these proposals to result in a significant change in how these transactions are accounted for.

(c) The proposed guidance added to PBE IPSAS 19 should be useful to entities in making judgements on whether or not a legal or constructive obligation exists.

#### Disclosure and RDR concessions (Section G)

5. Do you consider the disclosure requirements to be appropriate and proportionate to the needs of users of PBE financial statements?

We support the disclosure objectives. While we agree with cross-referencing to other applicable standards for transfer expenses and related balances disclosure requirements i.e. PBE IPSAS 30 *Financial Instruments: Disclosures* for financial assets and financial liability measured at amortised cost, and PBE IPSAS 19 *Provisions, Contingent Liabilities and Contingent Assets* for provisions. However, we are concerned it may not be entirely clear which disclosures from these standards are applicable, so we recommend the inclusion of paragraph references also.

As a separate point, we note paragraph 60 says: "An entity may enter an arrangement for a transfer that is not a binding arrangement" which appears superfluous in the context of a disclosure requirement. We recommend that the wording of this paragraph more closely aligns to that of paragraph 59; for example, "An entity shall disclose information about its material transfers without binding arrangements, including a description of the following".

6. Do you agree with the proposed reduced disclosure regime (RDR) concessions for Tier 2 PBEs?

Our response to question 5 is also relevant here with regards to more specificity with cross-referencing for RDR concessions for Tier 2 PBEs.

#### Implementation and specific issues (Section H)

7a. What challenges do you anticipate in implementing PBE IPSAS 48, including any specific transactions or scenarios where additional clarification may be needed? Please refer to our responses to questions 2, 3 and 4 which also include some anticipated implementation challenges. There will need to be a significant awareness raising campaign and education programme to support the implementation process, particularly for the NFP sector.

#### 7b. What support or guidance would be most helpful to assist with these challenges?

If the XRB decides to adopt the standard, establishing implementation working groups would be useful given the unfamiliar nature of the standard and the possible large quantum of transactions impacted.

#### Mandatory date and other comments (Section I)

#### 8. Do you agree with the proposed mandatory date of 1 January 2029?

Notwithstanding our above concerns regarding the ED, if the XRB proceeds with adopting the standard, we expect some PBEs may find transition a difficult and time-consuming exercise. We also expect the NFP sector may require additional support, therefore we agree that the XRB should provide a longer than normal lead time for entities to transition.

#### 9. Do you have any other comments on the ED?

Notwithstanding our above concerns regarding the ED, if the XRB proceeds with adopting the standard, we support the prospective application transition option as it would alleviate the cost of having to reassess all existing arrangements.

# **Appendix C**

#### About Chartered Accountants Australia and New Zealand

Chartered Accountants Australia and New Zealand (CA ANZ) represents more than 140,000 financial professionals, supporting them to build value and make a difference to the businesses, organisations and communities in which they work and live.

Around the world, Chartered Accountants are known for their integrity, financial skills, adaptability and the rigour of their professional education and training.

CA ANZ promotes the Chartered Accountant (CA) designation and high ethical standards, delivers world-class services and life-long education to members and advocates for the public good. We protect the reputation of the designation by ensuring members continue to comply with a code of ethics, backed by a robust discipline process. We also monitor Chartered Accountants who offer services directly to the public.

Our flagship CA Program, the pathway to becoming a Chartered Accountant, combines rigorous education with practical experience. Ongoing professional development helps members shape business decisions and remain relevant in a changing world.

We actively engage with governments, regulators and standard-setters on behalf of members and the profession to advocate in the public interest. Our thought leadership promotes prosperity in Australia and New Zealand.

Our support of the profession extends to affiliations with international accounting organisations.

We are a member of the International Federation of Accountants and are connected globally through Chartered Accountants Worldwide and the Global Accounting Alliance. Chartered Accountants Worldwide brings together members of 13 chartered accounting institutes to create a community of more than 1.8 million Chartered Accountants and students in more than 190 countries. CA ANZ is a founding member of the Global Accounting Alliance which is made up of 10 leading accounting bodies that together promote quality services, share information and collaborate on important international issues.

We also have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents more than 870,000 current and next generation accounting professionals across 179 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualifications.