



Chief Executive
External Reporting Board
PO Box 11250
Manners St Central
Wellington 6142
By email: submissions@xrb.govt.nz

27 November 2017

NZAuASB 2017-3 ED – Proposed Amendments to the definition of a public interest entity

Thank you for the opportunity to submit our views on the abovementioned exposure draft. We trust that our comments will be helpful to the External Reporting Board (XRB) for finalising the proposed amendments.

PwC New Zealand¹ is part of the global network of PwC firms. The firm is New Zealand's largest firm of chartered accountants, with seven offices and more than 1,200 partners and staff. Our practice as Chartered Accountants gives us extensive experience of a range of professional services that are valued by the wide variety of entities and individuals that participate in capital market and investment activities in New Zealand. In responding to this consultation, we draw on our areas of expertise in preparation and presentation of financial information, financial reporting compliance, and in the provision of assurance and related services.

Our comments on the Exposure Draft

We support the exclusion of “voluntary” Public Interest Entities (PIEs) from the definition of a PIE in the aforementioned exposure draft. We do not believe that the amendment will negatively impact the users of financial statements of entities that have voluntarily adopted PIE disclosure requirements and are of the view that this will remove other unintended consequences that arise for relevant entities. The revised definition of a PIE more appropriately captures entities of public interest where the financial statements are expected to be widely distributed and the users may have widely variant needs.

If you have questions or would like to discuss any aspect of our submission please do not hesitate to contact Karen Shires, Assurance Partner (karen.f.shires@nz.pwc.com 09-355-8624).

We understand the submission is subject to the Official Information Act 1982, and have no objection to the release of any information contained in our submission, or its publication on the XRB's website.

Yours Sincerely

A handwritten signature in black ink that reads 'Karen Shires'.

Karen Shires
Assurance Quality Partner

¹ This response is being filed on behalf of PwC New Zealand, a separate legal entity within the network of member firms of PricewaterhouseCoopers International Limited. References to “PwC”, “we” and “our” refer to PwC New Zealand.