

16 March 2018

Mr Warren Allen  
The Chief Executive  
External Reporting Board  
PO Box 11250  
Manners St Central  
Wellington  
6142

Dear Sir

**Requests to comment on Exposure Draft ED NZASB 2018-2 *Omnibus Amendments to Tier 3 and Tier 4 PBE Accounting Requirements***

Thank you for the opportunity to comment on the above Exposure Draft.

We are making this submission to you to assist the New Zealand Accounting Standards Board (NZASB) with the above Exposure Draft. We are happy for you to publish our comments publically.

In responding we have addressed the specific questions for respondents in Appendix 1.

More information on BDO is provided in Appendix 2 to this letter.

We hope that our responses and comments are helpful. Should you wish to discuss any of the points we have raised please contact me ([michael.rondel@bdo.co.nz](mailto:michael.rondel@bdo.co.nz)) should you have any queries or require further information.

Yours faithfully,



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## **Appendix 1 - Response to questions**

### **Question 1**

Do you agree with the proposed amendments to the Tier 3 standards to align terminology and concepts with the PBE Conceptual Framework? If you disagree, please provide reasons.

**Yes, we agree with the proposed amendments to align terminology and concepts with the PBE Conceptual Framework.**

### **Question 2**

Do you agree with the proposed amendments to the Tier 3 standards to clarify the accounting treatment for the reversal of impairment charges for assets? If you disagree, please provide reasons.

**Yes, we agree with the proposed amendments to clarify the accounting treatment for the reversal of impairment charges for assets.**

### **Question 3**

Do you agree with the proposed amendments to the Tier 3 standards to clarify the opting up requirements? If you disagree, please provide reasons.

**Yes, we agree with the proposed amendments to clarify the opting up requirements.**

### **Question 4**

Do you agree with the proposed amendments to the Tier 3 and Tier 4 standards to require disclosure of the date of approval and authorisation of the performance report? If you disagree, please provide reasons.

**Yes, we agree with the proposed amendments to require disclosure of the date of approval and authorisation of the performance report.**

### **Question 5**

Do you agree with the proposed amendment to the Tier 4 standards arising from the 2017 Amendments to XRB A1? If you disagree, please provide reasons.

**Yes, we agree with the proposed amendments to the Tier 4 standards arising from the 2017 Amendments to XRB A1.**

### **Question 6**

Do you have any other comments on ED NZASB 2018-2?

**We have no further comments on ED NZASB 2018-2.**

## **Appendix 2 - Information on BDO**

1. BDO New Zealand is a network of eleven independently owned accounting practices, with sixteen offices located throughout New Zealand.
2. BDO firms in New Zealand offer a full range of accountancy services, including business advisory, audit, taxation, risk advisory, internal audit, corporate finance, forensic accounting and business recovery and insolvency.
3. BDO in New Zealand has 89 partners and over 800 staff.
4. BDO firms throughout New Zealand have a significant number of clients in the not-for-profit sector.
5. Five BDO firms in New Zealand (BDO Auckland, BDO Christchurch, BDO Northland, BDO Waikato and BDO Wellington) are registered audit firms and thirteen audit partners are licensed auditors.
6. Internationally, BDO is the fifth largest full-service audit, tax and advisory firm in the world, with over 67,700 people in over 1,400 offices across over 158 countries and territories.