

28 March 2019

Warren Allen
Chief Executive
External Reporting Board
P O Box 11250
Manners St Central
Wellington 6142

Dear Warren

Submission on 2018 Amendments to XRB A1 Appendix A

Thank you for the opportunity to make a submission on the above Amendments. These should help clarify the understanding of entity type for financial reporting purposes.

I have answered the questions below:

1. Do you agree with the proposed amendments to XRB A1 Appendix A *When is an Entity a Public Benefit Entity?*

Yes, the increased range of indicators should be helpful for entities to ascertain whether they are a PBE or for-profit entity.

However, I note that in most of the sections (para 24, 29, 32, 34 and in respect of multiple objectives in para 19), there is a statement that an entity is 'likely to be a PBE'. Yet, paras 14-16 no such statements are provided. If they were, it would provide a purpose for these examples.

2. Do you agree with the proposed effective date of 1 January 2020?

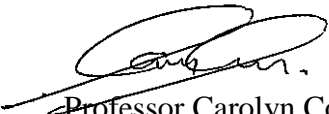
Yes, or earlier adoption as noted in the ED.

3. Do you have any other comments on the ED?

No.

I trust these are helpful in finalising the changes.

Yours sincerely,



Professor Carolyn Cordery,
Aston Business School