



Treasury

Contact: Peter Gibson  
Telephone: (02) 6215 3551  
Our Reference: A4967714  
Your Reference: XXXX

Dr Keith Kendall  
Chair  
Australian Accounting Standards Board  
PO Box 204  
Collins Street West  
VIC 8007

Dear Dr Kendall,

*Keith*

### Post Implementation Review of IFRS 10, 11 and 12

The Heads of Treasuries Accounting and Reporting Advisory Committee (HOTARAC) welcomes the opportunity to respond to the Request for Information (RFI) on the post-implementation review of IFRS 10, 11 and 12.

HOTARAC is an intergovernmental committee that advises Australian Heads of Treasuries on accounting and reporting issues. The Committee comprises the senior accounting policy representatives from all Australian states and territories and the Australian Government. The public sector in Australia has over \$760 billion in annual revenue and over \$2.8 trillion in assets.

The specific matters for comment relating to IFRS 10 and IFRS 11 rarely occur in the State and Commonwealth public sectors. Accordingly we make no comment on these specific matters. Further we have no additional issues with IFRS 10 and 11 that we wish to bring to the Board's attention at this time. In this regard we note that the additional guidance previously added to the Australian standard (AASB 10) has been useful in clarifying practical issues of control.

We do however, make a comment on the potential for increased disclosure in the RFI under IFRS 12. HoTARAC suggests that any proposed increases in disclosure are fully tested by the International Accounting Standards Board to ensure that they are useful to a significant number of users, and are not the request of a very small number of constituents. Doing this will balance the objective of providing information that is relevant to the majority of users, against the objectives of preventing information overload and keeping preparation costs to a reasonable level.

If you have any queries regarding HOTARAC's comments, please contact Peter Gibson from the Commonwealth Department of Finance on (02) 6215 3551 or by email to [peter.gibson@finance.gov.au](mailto:peter.gibson@finance.gov.au).

Yours sincerely

**Stewart Walters**  
Chair  
Heads of Treasuries Accounting and Reporting Advisory Committee  
March 2021