

**Constituents' Submissions – General Comments**  
**Exposure Draft 01/11: APES 330 Insolvency Services**

**Note: Specific comments relating to APES 330 Insolvency Services are addressed in a separate table. This table excludes minor editorial changes.**

Item No.	Paragraph No. in Exposure Draft	Respondent	Respondents' Comments
1		JAB	<p><b>Exposure Draft 01/11 Proposed Revised Standard APES 330 Insolvency Services</b></p> <p>Thank you for the opportunity to comment on this Exposure Draft for the revised APES 330 <i>Insolvency Services</i>. CPA Australia, the Institute of Chartered Accountants in Australia and the Institute of Public Accountants (the Joint Accounting Bodies) have considered the exposure draft and our comments follow. The Joint Accounting Bodies represent over 190,000 professional accountants in Australia. Our members work in diverse roles across public practice, commerce, industry, government and academia throughout Australia and internationally.</p> <p>The Joint Accounting Bodies support the issue of the proposed standard, recognising the need to revise the existing APES 330 <i>Insolvency Services</i>.</p> <p><b>General Comments</b></p> <p>The Joint Accounting Bodies consider the introduction of the 'Network Firm' definition in line with APESB's Code of Ethics and auditor independence appropriate in principle. However, we recognise that, when an insolvency practitioner is determining whether an appointment can be accepted and in that context is considering a range of relationships that have taken place with an insolvent entity, there are limited timeframes available in which to make these enquiries. We therefore consider that, in introducing a requirement to consider a broader range of relationships than previously, the standard should recognise the practical limitations that members will be operating under. We would therefore recommend that the APESB consider whether the standard should include wording which refers to reasonable or appropriate enquiries in this context. We have included some comments about specific paragraphs below that address this point.</p>
2		Deloitte	<p><b>Re: Proposed Revised Standard: APES 330 Insolvency Services</b></p> <p>We appreciate the opportunity to comment on the Proposed Revised Standard APES 330 <i>Insolvency Services</i> (the ED). We support the APESB's approach in revising the current APES 330 <i>Insolvency Services</i> so that its requirements are more closely aligned with those of the Insolvency Practitioners Association of Australia's <i>Code of Professional Practice</i> (the COPP).</p>

**Exposure Draft 01/11: Proposed Standard: APES 330 Insolvency Services**

Item No.	Paragraph No. in Exposure Draft	Respondent	Respondents' Comments
			<p>We believe that close alignment between the requirements of the COPP and APES 330 promotes consistency in the market and is in the interests of Members in Public Practice that provide Insolvency services by ensuring they are not subject to different and potentially conflicting sets of professional standards.</p>
3		GT	<p><b>EXPOSURE DRAFT ED 01/11 OF PROPOSED STANDARD: APES 330 INSOLVENCY SERVICES</b></p> <p>Grant Thornton Australia Limited (Grant Thornton) appreciates the opportunity to comment on the Accounting Professional and Ethical Standards Board's (APESB) ED 01/11 Proposed Standard APES 330.</p> <p>Grant Thornton's response reflects our position as business advisors and insolvency practitioners both to listed companies and privately held companies and businesses.</p> <p>Grant Thornton broadly supports the proposed draft of APES 330 as an APES standard, which will be effective from November 2011, given it follows the revised Insolvency Practitioners Association's (IPA's) <i>Code of Professional Practice</i> that was issued in January 2011 (second edition).</p> <p>The revised standard gives clearer guidance on professional independence and what is to be included within the Declaration of Independence, Relevant Relationships and Indemnities.</p>
4		IPA	<p><b>Proposed standard: APES 330 Insolvency Services Exposure Draft 1/11</b></p> <p>We refer to the above Exposure Draft released for consultation on 9 June 2011. We appreciate the opportunity to provide our comments.</p> <p>We have reviewed the exposure draft and make the following comments:</p>
5		McN	<p><b>APES 330 Exposure Draft 01/11</b></p> <p>I refer to your request for comment in regard to the APES 330, Exposure Draft 01/11.</p> <p>Overall, McGrathNicol supports the need for and the content of the APES 330 and welcomes the proposed amendments and the opportunity to comment. In particular, we applaud the efforts to align the Standard with the IPA Code of Professional Practice ("IPA CoPP").</p>

Item No.	Paragraph No. in Exposure Draft	Respondent	Respondents' Comments
			<p>We have two matters to raise for your further consideration:</p> <ul style="list-style-type: none"> <li>+ inconsistency in limitation periods for relationships requiring disclosure; and</li> <li>+ concerns regarding the breadth of restrictions which apply to “Managerial Employees”.</li> </ul> <p>These matters are addressed below.</p>

*Staff Instructions:*

- Comments of a “general” nature should be dealt with first, followed by paragraph specific comments.
- Respondents’ comments must be copied verbatim into this table.
- Comments should be dealt with in paragraph order, not respondent order.
- Use acronyms only for respondents. Update the attached table with details of additional respondents.

**RESPONDENTS**

1	JAB	The Joint Accounting Bodies
2	Deloitte	Deloitte
3	GT	Grant Thornton
4	IPA	Insolvency Practitioners Association of Australia
5	McN	McGrathNichol