

Review of Submissions – General Comments
Exposure Draft 01/18: APES 220 *Taxation Services*

Note: Specific comments relating to APES 220 are addressed in a separate table. This table excludes minor editorial changes.

Item No.	Paragraph No. in ED	Respondent	Respondents' Comments
1	N/A	CA ANZ	<p>Thank you for providing us with the opportunity to comment on the Accounting Professional & Ethical Standards Board's (APESB) proposed changes to APES 220 Taxation Services (APES 220). Chartered Accountants ANZ (CA ANZ) is supportive of the proposed revised Standard as a whole.</p> <p>We have the following specific recommendations to make with regards to the ED.</p>
2	N/A	CPAA	<p>CPA Australia represents the diverse interests of more than 160,000 members in 118 countries. We make this submission on behalf of our members and in the broader public interest.</p> <p>CPA Australia is generally supportive of the amendments proposed to the existing standard in the exposure draft, and provide the following specific comments and recommendations.</p>
3	N/A	Deloitte	<p>As outlined in the Exposure Draft 01/18 Proposed Standard: APES 220 Taxation Services (the Proposed Standard), the Accounting Professional & Ethical Standards Board (APESB) proposes to revise APES 220 <i>Taxation Services</i> which was issued in October 2007 and revised in March 2011 and October 2015.</p> <p>Given the relevance of this Proposed Standard to the delivery of taxation services to Deloitte's clients, we are pleased to provide the APESB with our comments on the Proposed Standard.</p> <p>As a leader in our profession, we express our support for the Proposed Standard and the professional principles it prescribes. However, we have some concerns about the practical implications of the Proposed Standard as currently drafted.</p> <p>We note however that it is difficult to provide a conclusive position on this Proposed Standard in the context of the recently released Exposure Draft on APES 110 (the Code) for which final comments are not due until 31 July 2018.</p>

Item No.	Paragraph No. in ED	Respondent	Respondents' Comments
4	N/A	PwC	<p>We welcome this opportunity comment on the Exposure Draft issued in respect of Proposed Standard: APES 220. As one of Australia's leading professional services firms, we believe we are well placed to share our perspectives on these important issues. We are committed to positively contributing to the Australian community and supporting and enabling initiatives that will strengthen the future prosperity of our country. Whilst we are supportive of the proposed revised Standard as a whole we have the following concerns regarding the "Professional Independence" section.</p> <ol style="list-style-type: none"> 1. Our primary concern with respect to the Proposed Standard is that the Professional Independence requirements outlined in paragraphs 3.6 to 3.8 lack clarity and therefore create a risk of misapplication of the proposed obligations by members. 2. Paragraph 3.6 gives a biased view as it does not address the safeguards outlined in APES 110 to reduce the independence risk to an acceptable level. 3. The proposed paragraph 3.6 is not aligned with the independence obligations under the Tax Agent Services Act ("TASA") and the Code of Professional Conduct (Code). 4. Paragraphs 3.7 and 3.8 merely restate well know concepts and are therefore largely redundant. 5. Paragraph 3.6 creates a misleading impression that tax services are prohibited unless the auditor independence rules are applied and cleared.
5	N/A	CA ANZ	Information about Chartered Accountants Australia and New Zealand can be found in Appendix A to this letter. If you have any questions regarding this submission, please contact me on (02) 9290 5535 or kristen.wydell@charteredaccountantsanz.com
6	N/A	CPAA	If you require further information on our views expressed in this submission, please contact Josephine Haste, Policy Adviser – Ethics and Professional Standards by email at josephine.haste@cpaaustralia.com.au or on +61 3 9606 9693.
7	N/A	Deloitte	We thank you for the opportunity to comment on this Exposure Draft. Please do not hesitate to contact us if you would like to discuss any of our comments.
8	N/A	PwC	Our detailed feedback is contained in the Appendix below. We would welcome the opportunity to discuss our views further. Please contact me on (02) 8266 7999 or by email at andrew.vickery@pwc.com

RESPONDENTS

1	CA ANZ	Chartered Accountants Australia and New Zealand
2	CPAA	CPA Australia
3	Deloitte	Deloitte Touche Tohmatsu
4	PwC	PricewaterhouseCoopers