



Australian Government

**Australian Accounting
Standards Board**

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Manager
Policy Development Unit
Standard Business Reporting
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The Treasury
Langton Crescent
PARKES ACT 2600

Sent via email: SBR_policy@treasury.gov.au

Dear Sir/Madam

Options Paper: Use of Standard Business Reporting (SBR) for Financial Reports

Thank you for the opportunity to comment on the Options Paper. The comments in this letter are those of the AASB staff. We have confined our comments to observations from a standard-setting perspective.

We consider that, in analysing the costs and benefits, in addition to identifying potential benefits to users of financial statements, reference should be made to XBRL and/or iXBRL lodgement of financial reports being potentially beneficial to those undertaking research on lodging entities and those responsible for regulating lodging entities.

The AASB has recently been involved with research on the nature and quality of financial statements lodged with the Australian Securities and Investments Commission (ASIC) with a view to making policy recommendations to government. The processing and analysis of the data has been labour-intensive. Electronic lodgement of information using XBRL and/or iXBRL would have greatly facilitated the process. The resources that had to be used on processing the data into a usable form could have been used on other important work.

We believe that regulators, including the ASIC, would benefit from XBRL and/or iXBRL lodgement by being better able to undertake surveillance of reported information, which is likely to result in an overall improvement in the quality of the information lodged, with consequential benefits to all users of that information.

The manner in which information is presented can be significant in communicating with financial statement users and a number of requirements in accounting standards specify where particular information is to be presented. Accordingly, we consider that the relevant presentation of financial statements must be evident from the information lodged (either electronically or in PDF). Users should be left having to re-construct the general purpose financial statement presentation for themselves.

We hope these comments are useful in forming recommendations on the electronic lodgement of financial reports. If you require further information on this matter from the AASB staff, please contact Angus Thomson (athomson@asb.gov.au).

Yours sincerely

A handwritten signature in black ink that reads "K.M. Stevenson". The signature is written in a cursive style with a large, sweeping initial "K" and "M".

Kevin M Stevenson
Chairman and CEO