

Tuesday, 26th of February 2013

AMENDED TAX AGENT SERVICES ACT 2009

Dear Sir/ Madam

I write to support the principle expressed in Exposure Draft of the Amendments to the Tax Agent Services Act 2009.

Specifically

19 After subsection 90 10(1)

Insert:

(1A) The Board may, by legislative instrument, specify that another service is a **BAS service**.

As a BAS Agent in Practice there are a number of real world duties that our clients expect us to perform that need to be included in our permitted roles. We support this change to allow the TPB to then immediately specify

1. The ascertaining of an obligation or liability of an entity, the provision of advice to an entity, the provision of information to the commissioner in relation to the Superannuation Guarantee laws and the Superannuation Guarantee Charge laws.
2. The ascertaining of an obligation or liability of an entity, the provision of advice to an entity, the provision of information to the commissioner in relation to the Construction Industry reportable payments system (which requires reporting in July 2013).

I see that by allowing the TPB to be able to respond to changes to other laws in this manner will be more appropriate.

However, I **do not** support the concept provided in the increased provisions as to Professional Indemnity Insurance. I do not believe that an Agents registration should require an agent to obtain a certain type of insurance because such a requirement would be overly oppressive and perhaps unreasonable. Although I believe that it is good practice for a business to hold appropriate insurance I am fundamentally against requiring that a business take out a particular type of insurance at their own expense.

Please contact us if you would like any further information in relation to the effects of this regime on my business.

Yours faithfully

Aaron Toon
Bookkeeper/ Accountant

26/02/2013