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**Sent on:** Thursday, July 18, 2024 6:36:53 AM

**To:** PwC Response < PwcResponse @ TREASURY.GOV.AU > **Subject:** Reviewing the professional association accreditation and

registration pathways

Follow up: Follow up

**Start date:** Friday, July 19, 2024 12:00:00 AM **Due date:** Friday, July 19, 2024 12:00:00 AM

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## Hello

My submission relates to the following question:

## How should tax practitioners who are currently registered under the voting member pathway be treated if RPA pathway was to be removed?

In short and derived by personal experience, the treatment should be no different to as present as in my case, I applied to and was approved by the TPB as a registered tax agent in 2012, and shortly thereafter, so too was my company which operates my business.

Briefly put, my application of some 12 years ago included my having:

- 1. No formal tax or accounting qualifications.
- 2. Trained two registered tax agents on the operation of the tax law to which they attested to the TPB was at a very high technical level as well as very being broad in tax subject matters, and that such training was otherwise unavailable in the marketplace.
- 3. Voting member rights of a Board approved tax agent association.
- 4. At least 10 years experience in dealing with the tax law/providing a tax agent service.

Since then, my company has consistently run its registered tax agent business, having lodged thousands of returns and documents with the Commissioner for my individual, sole trader, partnership, company, trust and smsf clients, without complaint.

It is inconceivable to me that with my 22 years of deep practical experience working in the tax law, that I should for any reason whatsoever not attributable to my own fault, be suddenly soon finding myself being held to a different standard in order to continue in my well-established and highly functional tax practice.

Kind regards

## FRANK GENOVESI NTAAF, AFA, MIPA

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