

8 March 2021

Mr Douglas Niven  
Chief Accountant, Financial Reporting and Audit  
Australian Securities and Investments Commission  
GPO Box 9827  
Brisbane QLD 4001

**By email: [policy.submissions@asic.gov.au](mailto:policy.submissions@asic.gov.au)**

Dear Doug

**ASIC consultation paper 338 Remaking ASIC class order on parent entity financial statements: [CO 10/654]**

As the representatives of over 200,000 professional accountants in Australia, Chartered Accountants Australia and New Zealand (CA ANZ) and CPA Australia thank you for the opportunity to comment on the above consultation paper (CP 338). It sets out ASIC's proposals to extend the operation of ASIC Class Order 10/654, which is due to sunset on 1 April 2021.

This class order permits parent entity financial statements to be presented alongside consolidated financial statements in financial reports prepared under Chapter 2M of the Corporations Act 2001. This flexibility provides important and practical relief to a range of entities, allowing them to prepare both interim and full year financial statements that best meet the needs of their users while still complying with other regulatory reporting obligations, including those under Chapter 2M and Chapter 7. We agree with ASIC's view that this class order is operating effectively and efficiently and continues to form a necessary and useful part of the legislative framework. We therefore support ASIC's proposal to update and renew the class order for a further 10 years.

We also support the minor revisions ASIC is proposing to the new draft legislative instrument, ASIC Corporations (Parent Entity Financial Statements) Instrument 2021/XX, included with CP 338, which update CO 10/654 as required and make it easier to understand without impacting its operation.

If you have any questions about our submission, please contact either Amir Ghandar (CA ANZ) [amir.ghandar@charteredaccountantsanz.com](mailto:amir.ghandar@charteredaccountantsanz.com), or Ram Subramanian (CPA Australia) at [ram.subramanian@cpaaustralia.com.au](mailto:ram.subramanian@cpaaustralia.com.au).

Your sincerely

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