

Gregory F Parkin
GPO Box 6
CANBERRA ACT 2600

The Manager
Taxation of Financial Arrangements
The Treasury
Langton Crescent
PARKES ACT 2600

By email: tofa@treasury.gov.au

Dear Manager

Exposure Draft – taxation of financial arrangements

I suggest two additions to the draft legislation that was placed on the Treasury website on 19 April 2010.

That draft legislation is the “EXPOSURE DRAFT (07/04/2010)” of a Schedule to a *Tax Laws Amendment (2010 Measures No.4) Bill 2010*.

I suggest that the Bill include a change to the heading of section 230-500 of the ITAA 1997. The heading should be “Comparable foreign standards of accounting and auditing” (instead of the current heading “Comparable foreign accounting and auditing standards”).

I suggest that the Note to subsection 230-210(2) of the ITAA 1997 be further amended (in addition to the amendment in item 34). Omit “foreign accounting and auditing standards”, substitute “foreign standards of accounting and auditing”.

These additions would be consistent with the existing provisions of the draft Bill that are described at the final dot point of paragraphs 1.63 and 1.67 of the “Explanatory Material”. The consistent pattern of those amendments is that the comparable foreign standards are not to be described as accounting standards or auditing standards.

Yours sincerely

Gregory F Parkin

14 May 2010