2 March 2012

Ms Patricia Scott
Productivity Commission
15 Moore Street
CANBERRA CITY ACT 2600

Dear Ms Scott

ASIC AND STANDARD BUSINESS REPORTING

I refer to the Australian Government Productivity Commission discussion draft released in December 2011 for the study on the impact of the Council of Australian Governments (COAG) Reforms: Business Regulation and Vocational Education and Training (VET).

I am writing to comment on ASIC's involvement in the Business regulation reforms, in particular the Standard Business Reporting (SBR) program, and to confirm our strong support for achieving the aims of the SBR reforms.

By way of background, on 1 July 2010 ASIC implemented functionality to support the lodgement of financial reports to ASIC through the SBR service. This work was delivered within the defined scope of the Government program. ASIC received new policy funding for the implementation of those changes.

ASIC delivered five SBR enabled forms, including financial reports lodged by public and large proprietary companies. Financial reporting forms, in particular, were SBR enabled given the significant information contained in them and the market's use and analysis of that information on a regular basis. ASIC is pleased that we now have a number of software developers registered with us for SBR services and we look forward to increasing SBR lodgements of these forms as commercial software is developed to facilitate easy lodgement with ASIC.

ASIC actively participates in the SBR project at many levels including the SBR Board (ASIC Commissioner representation), the Taxonomy Approval Committee, Strategy Change Control Forum, and SBR Steering Committee. ASIC is also actively involved with Treasury and the SBR program in promoting lodgement with large customers and development of strategy relating to mandating of XBRL.

ASIC has a current program of work to implement COAG Business Name reforms in May 2012, and to replace our machine to machine channel (known as EDGE) by November 2012. EDGE supports around 800,000 lodgements through software packages annually.

We are using various aspects of the SBR service in designing our new services for both the business names reforms and in replacing our EDGE system, namely: AUSkey (for business to government, and government to government authentication); web services; SBR definitional taxonomy; and standard messaging structures. These steps will make it easier for us to fully adopt SBR in future.

ASIC will further implement SBR (and expand our use of XBRL and SBR core services) within its own IT framework as funding and priorities permit. In a practical sense this means we are building SBR into our planning and funding proposals for new IT projects and we will continue to do so. We also note that SBR is increasingly becoming a major part of new Government initiatives that ASIC is involved in implementing.

In summary, ASIC is committed to progressing SBR implementation to achieve the full potential of these reforms.

Your sincerely

GREG MEDCRAFT
CHAIRMAN