

Ms Kate Spargo
Chairperson
Accounting Professional and Ethical Standards Board
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30 June 2011

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Dear Ms Spargo

**EXPOSURE DRAFT ED 01/11 OF PROPOSED STANDARD: APES 330
INSOLVENCY SERVICES**

Grant Thornton Australia Limited (Grant Thornton) appreciates the opportunity to comment on the Accounting Professional and Ethical Standards Board's (APESB) ED 01/11 Proposed Standard APES 330.

Grant Thornton's response reflects our position as business advisors and insolvency practitioners both to listed companies and privately held companies and businesses.

Grant Thornton broadly supports the proposed draft of APES 330 as an APES standard, which will be effective from November 2011, given it follows the revised Insolvency Practitioners Association's (IPA's) *Code of Professional Practice* that was issued in January 2011 (second edition).

The revised standard gives clearer guidance on professional independence and what is to be included within the Declaration of Independence, Relevant Relationships and Indemnities.

Grant Thornton note the additional requirement for insolvency practitioners who have an interest in, or an ability to influence a business in the same market as the insolvent company, to eliminate this conflict of interest or decline the appointment. This requirement appears to be very broad in its application and we suggest needs further clarification and less subjective interpretation.

If you require any further information or comment at this time, please contact me.

Yours faithfully

GRANT THORNTON AUSTRALIA LIMITED



Paul Billingham

Head Of Recovery And Reorganisation