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24 November 2011

The Chairman
Auditing and Assurance Standards Board
PO Box 204
Collins Street West
MELBOURNE VIC 8007

Dear Merran

## Re: Response Consultation Paper: Assurance Engagements on General Purpose Water Accounting Reports

The Victorian Water Industry Association (VicWater) wishes to express its support of the Victorian Department of Sustainability and Environment's (DSE) response to the Consultation Paper: Assurance Engagements on General Purpose Water Accounting Reports.

VicWater has completed extensive consultation including facilitated workshops, development of an industry working group as well as a collation of industry responses. Throughout this process we have worked closely with DSE ensuring that industry feedback is represented in DSE's response.

Our biggest concern is the use of 'best practice' in the reporting standard on a costs and benefits scale. Time and costs of reporting throughout the industry are already quite substantial if a 'best practice' model came into place we would see those rise again dramatically and believe the potential benefits are not matched to these costs.

We wholly support the response prepared and have received endorsement from the Victorian industry to adopt the response formulated by DSE.

Some businesses may also provide additional responses specific to their processes.

Please feel free to contact me should you have any questions.

Yours sincerely

Tony Wright

**Chief Executive Officer**