

THE BOARD OF TAXATION

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INQUIRIES

Inquiries regarding this report may be directed to:

Board of Taxation Secretariat
c/- The Treasury
Langton Crescent
PARKES ACT 2600

Telephone: 02 6263 4366

Facsimile: 02 6263 2617

Email: taxboard@treasury.gov.au

1. INTRODUCTION

The Board of Taxation (the Board) is a non-statutory advisory body charged with contributing a business and broader community perspective to improving the design of taxation laws and their operation.

The Board currently comprises eleven members, eight of whom, including the Chair, Mr Michael Andrew, are from the non-government sector. There are three ex officio members — the Secretary to the Australian Treasury, the Commissioner of Taxation and the First Parliamentary Counsel. Further details on the membership of the Board are at Appendix A. The Board is supported by a small secretariat located in the Treasury.

Its Charter, including the mission, governs the operations of the Board and functions set out below. The Charter is reproduced in full at Appendix B.

1.1 The Board's mission

Recognising the Government's responsibility for determining taxation policy and the statutory roles of the Commissioner of Taxation and the Inspector-General of Taxation, the Board's mission is to contribute a business and broader community perspective to improving the design of taxation laws and their operation.

1.2 The Board's functions

The Board works closely with the private sector to provide real-time advice to the Treasurer on tax policy issues. The Board members contribute their business experience at an early stage in the policy development process.

The Board also conducts technical and post-implementation reviews of tax law, and undertakes research and other studies approved or referred by the Treasurer.

A full list of the Board's activities during the 2014-15 year is set out below.

2. ACTIVITIES OF THE BOARD IN 2014-15

2.1 Overview

2.1.1. Taxation of Financial Arrangements

In July 2014, the Board completed its review to assist Treasury to determine the scope of its review of the Taxation of Financial Arrangements (TOFA) regime. As part of this review, the Board identified and prioritised legislative and administrative changes that have the potential to improve the operation of the TOFA regime.

2.1.2. Small business

In August 2014, the Board completed its fast-track review to identify features of the tax system that are unreasonably or unnecessarily hindering or preventing small businesses from pursuing and achieving their commercial goals.

2.1.3. Division 7A

The Board provided its report on Division 7A of Part III of the *Income Tax Assessment Act 1936* to the Government in November 2014.

2.1.4. The thin capitalisation arm's length debt test

The Board provided a report on its review of the thin capitalisation arm's length debt test to the Government in December 2014.

2.1.5. Debt and equity tax rules

The Board delivered its final report on the debt and equity tax rules to the Government in two parts: a report on related schemes and equity override integrity provisions in December 2014 and a report on the other aspects of these rules in February 2015.

2.1.6. Changes to the Board

The conclusion of the 2014 calendar year saw the departure from the Board of a number of its members upon the conclusion of their terms of appointment. The outgoing members were Chair Mrs Teresa Dyson, Deputy Chair Mr Keith James, Mr Curt Rendall and Ms Elizabeth Jameson. The Government recognised the significant contributions of the outgoing members during their terms with the Board.

In December 2014, the Government announced four new appointments to the Board. Mr Michael Andrew was appointed as Chair and Mrs Peggy Lau-Flux, Dr Mark Pizzacalla and Mr Craig Yaxley were appointed as new members. In May 2015, the Government announced three further appointments: Mr Neville Mitchell, Ms Karen Payne and Mrs Ann-Maree Wolff. It also announced the re-appointment of Mr John Emerson AM, at which time he was also appointed as the Deputy Chair of the Board.

In the 2015 calendar year, the Board has been asked to providing policy advice to the Government in 'real-time' while continuing to conduct technical reviews.

2.1.7. Budget measures — multinational tax avoidance and small business tax incentives

In March and April 2015, the Board assisted the Government to develop Budget measures to combat multinational tax avoidance and reduce the tax burden on small businesses.

2.1.8. Tax White Paper

In May and June 2015, the Board assisted in the Tax White Paper process by forming working groups to consult and advise on tax reform issues relating to large business tax, small business tax and international tax, and to participate in consultations by Treasury. The Board reported its findings to the Secretary of Treasury on 26 June 2015. It continues to assist Treasury in relation to the Tax White Paper process.

2.1.9. Anti-hybrid rules and a tax transparency code

As part of the 2015 Budget, the then Treasurer announced two new references for the Board:

- Consultation on the implementation of anti-hybrid rules developed by the Organisation for Economic Co-operation and Development (OECD); and
- The development of a tax transparency code for the increased public disclosure of tax information, particularly large multinationals.

The Board established Working Groups of its members to assist the Board in developing its advice to Government on these references. It is on track to provide its advice by the reporting date of March 2016 for the anti-hybrid review and May 2016 for the tax transparency code.

2.1.10. Regulation reform

The Board continued its work advising the Government on deregulation during the year. In October 2014, the Board formed a Working Group, chaired by Mr Peter Quiggin PSM, to progress the Board's deregulation work. The Working Group performed a stocktake of existing regulation and began identifying and prioritising deregulation ideas.

The Board identified Fringe Benefits Tax (FBT) as a high priority area for regulation reform, and formed an FBT consultation group to consider FBT reform proposals.

2.2 Completed references

During the 2014-15 year, the Board completed a number of projects referred to it by the Government and the previous Government, as set out below.

2.2.1. Post-implementation review of Division 7A of Part III of the *Income Tax Assessment Act 1936*

On 18 May 2012, the then Assistant Treasurer and Minister Assisting for Deregulation announced that the Board would undertake a post-implementation review of Division 7A of Part III of the *Income Tax Assessment Act 1936*. Division 7A contains integrity provisions designed to prevent shareholders (or their associates) of private companies from inappropriately accessing the profits of those companies in the form of payments, loans or debt forgiveness transactions.

The Board provided its final report to Government in November 2014. The Board's report includes 15 recommendations and proposed two reform models:

- an Amortisation Model that would require loans by companies to shareholders to be repaid with interest with special rules applying to loans to trusts; and
- an Interest Only Model that would require only interest payments on loans to shareholders and associates.

In June 2015, the Government released the Board's report to assist the national conversation on the future of the tax system.

2.2.2. Review of the debt and equity tax rules

On 14 May 2013, the then Deputy Prime Minister and Treasurer and the then Assistant Treasurer announced that the Board would undertake a post-implementation review of the debt and equity rules.

The Board provided the Government with the first part of the review, an Accelerated Report on the Related Schemes and Equity Override Integrity Provisions in December 2014. The Government released this report together with its response, on 2 April 2015. It also announced that it would undertake consultation on exposure draft legislation to implement the Board's recommendations.

The Board provided the Government with its final report for the review in March 2015. The Board was grateful to the outgoing Chair, Mrs Dyson, for her ongoing assistance with the review.

In June 2015, the Government released the Board's Final Report to assist the national conversation on the future of the tax system.

2.2.3. Review of the thin capitalisation arm's length debt test

On 14 May 2013, the then Deputy Prime Minister and Treasurer and the Assistant Treasurer asked the Board to undertake a review of the arm's length debt test as it applies to the thin capitalisation rules. The arm's length debt test is one of three tests that can apply to set the maximum allowable debt limits under the thin capitalisation rules (the other two being the 'safe harbour' test and the worldwide gearing ratio test). The arm's length debt limit is the gearing level that is considered to be 'commercial or independent', having regard to certain factors and applying certain assumptions.

The Board's review focussed on making the test easier to comply with and administer, and to clarify in what circumstances it should apply. The Board provided its final report to Government by the end of December 2014. In June 2015, the Government released the Board's report to assist the national conversation on the future of the tax system.

2.2.4. Review of Tax Impediments facing Small Business

On 28 March 2014, the Government announced that the Board would conduct a fast-track review to identify features in the tax system that are hindering or preventing small businesses from reaching their commercial goals.

After considering the views from stakeholders and conducting consultation, the Board provided its report to the Government in August 2014.

On 20 January 2015, the Government announced the release of the Board of Taxation's report on its review of tax impediments facing small business and the Government's response to the Board's report.

2.2.5. Scoping Review of the TOFA regime

In May 2014, the Treasury sought advice from the Board to determine the scope of Treasury's upcoming review of the TOFA regime. As part of this request, the Board was asked to identify and prioritise legislative or administrative changes that have the potential to improve the operation of the TOFA regime. The Board provided its advice to Treasury on 28 July 2014.

2.3 New references

During the 2014-15 year, the Board began work on a number of new projects referred to it by the Government, as set out below.

2.3.1. Tax Transparency Code

As part of the 2015 Budget, on 12 May 2015 the Treasurer asked the Board to lead the development of a new code on greater public disclosure of tax information by businesses, particularly large multinationals.

The terms of reference state the Government would like more businesses, particularly large multinationals, to be more publicly transparent about their tax affairs.

The Chair is leading the Board's work on development of the tax transparency code. The Chair is assisted by a number of other Board members, including Mrs Wolff, Mr Emerson and Mr Mitchell. A working group has been established including representatives of the Australian Taxation Office (ATO), Treasury, academia, businesses and professional firms.

The Government has asked the Board to develop the code by May 2016.

2.3.2. Anti-Hybrid rules

As part of Australia's response to the G20/OECD Base Erosion and Profit Shifting (BEPS) Action Plan for hybrid mismatch arrangements, the Treasurer asked the Board on 12 May 2015 to consult on implementation of the OECD's recommended anti-hybrid rules in Australia.

The Board appointed Ms Payne to oversee the review. The Board also appointed a working group including private sector representatives to provide specialist assistance for the review.

The Board's review will focus on identifying the major implementation considerations involved, including interaction of the OECD recommendations with Australia's tax laws and the appropriate timing for implementation.

The Government has asked the Board to report by the end of March 2016.

2.4 Broader work of the Board

The other key activities of the Board during the 2014-15 year (aside from the referred projects noted above) are set out below.

2.4.1. Base Erosion and Profit Shifting

The Board is participating in the national and international debate on multinational tax avoidance, also known as BEPS. The BEPS Action Plan is a two year project conducted by the G20 and the OECD that aims to address a number of gaps and weaknesses in international tax rules.

The Board conducted three consultation meetings with businesses in March 2015 to obtain the views of business on the impact of the BEPS Action Plan and other international developments in taxation.

The Board considered the feedback and wrote to the Treasurer on 17 April 2015 to provide a summary of the key findings from the consultations.

The Chair also attended the G20 International Tax Symposium in Istanbul on 6-8 May 2015 to discuss the progress of the BEPS Action Plan and next steps.

2.4.2. Budget measures

The Government asked the Board to provide feedback on the design of a number of measures for the 2015-16 Budget.

The Board assisted in the design of integrity measures aimed at strengthening Australia's tax laws to prevent multinational tax avoidance. The Board reviewed a number of proposals and provided feedback to Treasury.

The Board also assisted in the design of the 'Growing Jobs and Small Business' measures by providing feedback to Treasury on a number of proposals.

2.4.3. Taxation White Paper

In April 2015, the Board formed three working groups to assist the Government with consultation on the Tax White Paper discussion paper (Re:think):

- A Large Business Tax Working Group comprising Board members Mr Yaxley (Chair of the Working Group), Mrs Wolff and Mr Mitchell.
- An International Business Tax Working Group comprising Board members Mrs Wolff (Chair of the Working Group), Ms Lau-Flux and Ms Payne.
- A Small Business Tax Working Group comprising Board Members Dr Pizzacalla (Chair of the Working Group) and Mr Emerson.

The Board's working groups consulted with a number of business groups, industry associations and tax academics on Re:Think during May and June 2015.

The Board sought to consult as broadly as possible and Treasury and the ATO were invited as observers to ensure that tax reform messages were received directly by those with responsibility for advising the Government on tax reform.

Following these consultation sessions, the Board considered its views and wrote to the Government on 26 June 2015 to advise the Board's recommendations for the direction of tax reform in Australia.

2.4.4. Deregulation

Assisting the Government in reducing the regulatory burden associated with taxation was a key focus for the Board in the 2014-15 year. This focus arose both because of the Board's role as the Ministerial Advisory Council (MAC) for tax matters and from its general mandate to contribute to the improvement to the general integrity and functioning of the taxation system.

In October 2014, the Board formed a Working Group, chaired by Mr Quiggin, to progress the Board's deregulation work.

2.4.4.1. Ministerial Advisory Council

The Government's regulation reform agenda includes the establishment of stakeholder consultation mechanisms, or MACs. MACs are comprised of business, not-for-profit and other industry stakeholders and they provide advice to Ministers and their respective departments on opportunities to reduce red and green tape as well as provide a broader consultation mechanism on policy matters.

The then Treasurer asked the Board to fulfil the role of the MAC in relation to tax matters. In fulfilling the MAC role the Board is asked to:

- identify potential targets for regulatory reform (for example, areas of inefficient regulation, excessive red tape or unnecessarily high regulatory burden);
- provide a sounding board for regulatory reform or repeal proposals;
- provide feedback on the progress of regulatory reform within the portfolio; and
- advise on broader policy issues relevant to the portfolio.

In particular, the Board is to provide appropriate input on:

- immediate deregulatory tasks, including the stocktake and audit of tax regulation; and
- future regulatory reforms, that is, ideas on deregulatory opportunities and priorities that can be included in the regulatory budgeting process. This includes identifying items for future repeal days.

2.4.4.2. Stocktake of existing regulation

The initial phase of the deregulation project involved assisting Treasury with a stocktake of current regulation and analysis of the cause of regulatory burden, including an estimate of the compliance costs of regulation in the Treasury portfolio. Members of the Board reviewed and provided comments on the Treasury report.

2.4.4.3. Identifying and prioritising deregulation ideas

To further the Government's deregulation agenda, the Board invited the Government, business and community stakeholders to provide deregulation ideas. Over 150 ideas were identified through this process, ranging from large-scale reform of significant areas of the tax law to small administrative irritants that arise in the day-to-day management of taxpayers' affairs.

Subsequently, the Board conducted workshops with key stakeholders to prioritise the issues based on such factors as the amount of deregulatory savings and ease of implementation. The Board, with assistance from the ATO and Treasury, then prioritised the ideas received.

In May 2015, the deregulation working group established a FBT consultation group to consider FBT reform proposals. The consultation group comprised a private sector FBT practitioners and representatives of Treasury and the ATO. The work of the FBT consultation group is ongoing as at the conclusion of the 2014-15 year.

2.4.4.4. Regulatory Performance Framework

The Government's deregulation agenda includes the establishment of the regulatory performance framework, a framework that focuses on one aspect of the performance of regulators – minimising compliance costs. The Board, as the MAC for tax policy matters, will have the role of reviewing the performance of regulators in the tax portfolio, such as the ATO.

In June 2015, two of the Board members, Mr Mitchell and Mr Emerson, reviewed the performance metrics proposed to be used in the assessment of the ATO under the regulatory performance framework.

The first yearly assessment period will begin on 1 July 2015. It is anticipated that the Board will have an ongoing role in the monitoring of the ATO's performance under the regulatory performance framework.

2.4.4.5. Tax Issues Entry System

The Board continued to assist with the Tax Issues Entry System (TIES), which is a Board initiative jointly managed by the ATO and the Treasury.

The TIES provides an opportunity for stakeholders to raise issues relating to the care and maintenance of the Australian tax and superannuation systems. Broadly, care and maintenance issues are concerned with making sure the existing law operates in the way it was intended by correcting technical or drafting defects, removing anomalies and addressing unintended outcomes. Care and maintenance issues could involve minor policy changes, though they typically would not have a significant revenue impact.

The Board is working with the ATO and Treasury to revisit the current operational arrangements for the consideration of TIES issues with a view to a more responsive process and timely resolution of TIES issues. The revised processes will commence in the 2015-16 year.

2.5 Consultation

The Board undertakes a program of regular consultation with external stakeholders, including members of its Advisory Panel, on issues falling within its Charter. Formal consultation meetings held in 2014-15 are detailed in Table 5 at Appendix E.

The Board is also represented on the ATO's Consultation Steering Group. The Consultation Steering Group is co-chaired by the ATO and Treasury and meets every two to three months, as required. It ensures that significant tax and super matters for consultation are identified and kept on track, with the right people involved. Board members or their delegates attended meetings on 24 October 2014 and 23 April 2015.

2.6 Meetings

The Board met as a whole on 11 occasions during 2014-15, as shown in Table 1, at varying locations. Details of Board members' attendance at meetings are provided at Appendix C.

Table 1: Board of Taxation meetings, 2014-15

Date	Location
18 July 2014	Perth
15 August 2014	Sydney
12 September 2014	Canberra
17 October 2014	Adelaide
7 November 2014	Melbourne
12 December 2014	Brisbane
13 February 2015	Sydney
20 March 2015	Canberra
17 April 2015	Melbourne
15 May 2015	Canberra
18 June 2015	Brisbane

The Board generally conducts its projects by appointing working groups comprising members of the Board, Advisory Panel members, consultants and officers from the Treasury and the ATO, and private sector and academia specialists.

A list of working groups for 2014-15, and the Board members appointed to each working group, is provided at Appendix D. Each of these working groups met on numerous occasions during 2014-15 and engaged in consultation in relation to the projects. These consultations are outlined in general terms in Appendix E. All projects undertaken in 2014-15 are also outlined in further detail below.

2.7 Advisory Panel

In July 2002, the Board established an Advisory Panel to assist it in the general performance of its role. The Panel currently comprises 52 taxation specialists who have agreed to assist the Board, on a basis, with its work. Panel members are appointed based on their individual capabilities and expertise, and not as representatives of particular interests.

The Panel provides an additional source of advice to that provided by the business, professional and other community representative organisations with which the Board has developed close working relationships. The Board met Advisory Panel members on a number of occasions during 2014-15 to discuss Board projects and general issues associated with the integrity and functioning of the tax system.

Membership of the Advisory Panel changes from time to time and reviewed periodically by the Board. During 2014-15, two members of the Advisory Panel became members of the Board (Ms Payne and Mr Yaxley). There were no other changes to the members of the Panel during 2014-15.

The Board wishes to record its appreciation for the contributions made by Panel members to the Board's work during 2014-15. Panel membership as at 30 June 2015 is set out at Appendix H.

2.8 Assistance provided for the Board's reviews

The Board draws substantially on work done by officers of the Treasury and ATO when undertaking its reviews. The Board wishes to record its appreciation for the extensive assistance provided by the Treasury and ATO officers involved in the Board's work during the 2014-15 year.

The Board was also assisted with its projects by experts from the private sector, and academia during the 2014-15 year, and wishes to record its appreciation for their assistance.

Assistance with the Board's consultation on the implementation of new laws to neutralise hybrid mismatch arrangements (anti-hybrid rules) is being provided by Mr Grant Wardell-Johnson, Mr Mark Ferrier, Mr Chris Vanderkley, and Mr Michael Fenner.

Assistance with the Board's development of a tax transparency code is being provided by Ms Fiona Martin, Mr Vic Timos and Mr David Watkins.

Assistance with co-ordination of the Board's input in the Tax White Paper (Re:think) process was provided by Mr Trevor Hughes, Mr Michael Barbour, Mr Ian Scott, Mr Chris Vanderkley, Mr Philip Barlin, Mr Andrew Porter, Mr Peter Collins, Mr Michael Parker, Dr Brett Freudenberg and Ms Robin Buckham.

Assistance for the Board's post-implementation review of Division 7A of Part III of the *Income Tax Assessment Act 1936* was provided by Mr Alexis Kokkinos, Mr Mark Molesworth, and Mr Mark West (engaged as a consultant).

Assistance for the review of the debt and equity tax rules was provided by Mr Patrick Broughan, Mr John Condon, Mr Larry Magid, Mr Hayden Scott, Mr Richard Richards, Mr Jeff Shaw, Mr Frank O'Loughlin (engaged as a consultant) and Mr John Smith (engaged as a consultant).

Assistance for the review of the thin capitalisation arm's length debt test was provided by Mr Nick Houseman, Mr Paul Hooper, Ms Anthea McKinnell, Ms Karen Payne and Mr Mark Goldsmith (engaged as a consultant).

Assistance for the Board's review of tax impediments facing small business was provided by Mr Matthew Addison, Mr Stephen Baxter, Mr Michael Caruthers, Mr Michael Parker, Mr Robert Powell and Ms Shannon Smit.

Assistance for the Board's advice on the scope of the review of TOFA review was provided by Mr Matt Osmond, Mr Andrew Hirst, Mr Tony Frost and Ms Jenny Wong (all engaged as consultants).

2.9 Website

The Board of Taxation's website www.taxboard.gov.au provides general information on the Board, including its membership, the Board's Charter, contact details, Board press releases and Board reports to the Government.

3. THE YEAR AHEAD

During the 2015-16 year, the Board expects to increase its focus on providing policy advice to the Government in 'real-time', in line with the change of strategic direction that occurred at the beginning of the 2015 year. Specifically, the Board intends to focus on the areas outlined below, in addition to any other matters referred to it by the Treasurer.

The Board will continue to pursue its objectives as set out in its Charter, including issues relating to the general integrity and functioning of the tax system.

3.1 Taxation White Paper

The Board expects that it will continue to play a role in supporting the Taxation White Paper process during 2015-16, providing a business and broader community perspective on a range of issues. This could include conducting further research and consultation particular tax reform topics, or providing its view on proposals for new policies.

3.2 Deregulation

Mr Quiggin will continue to lead the Board's work on deregulation, with assistance from Mr Mitchell, Dr Pizzacalla and Mr Yaxley.

The Board will finalise the prioritisation and assessment of all regulation reform ideas it has received to date. It intends on referring any suitable ideas to the ATO and Treasury for consideration and, in 2016, plans on establishing a revised process for the management of new regulation reform ideas. Specifically, the Board intends to establish an online collaborative platform that allows the public to submit ideas for regulation reform. It will harness the wisdom of crowds in determining the relative merits and priority of each idea.

In continuing its role as the MAC for tax policy matters, the Board will also review the performance of regulators in the tax portfolio (including the ATO) against agreed assessment metrics as part the regulatory performance framework.

3.3 Tax Transparency Code

The Chair will continue to lead the Board's work on development of the tax transparency code. A number of other Board members, including Mrs Wolff, Mr Emerson and Mr Mitchell, will continue to assist the Chair. The Board expects to release a discussion paper to support further consultation on the development of the code by the end of 2015. It is on track to deliver its final report on the code by May 2016.

3.4 Anti-Hybrid rules

Ms Payne will continue to lead the Board's work on consultation on implementation of anti-hybrid rules developed by the OECD. The Board intends to conduct consultations and release a discussion paper by the end of 2015. The Government has asked the Board to report by March 2016.

3.5 Tax Policy Development

The Chair will lead the development of the Board's advice on improving tax policy development and reducing tax system complexity, as part of the Tax White Paper process. The Board will also consider the potential to achieve these goals via revised institutional arrangements.

4. APPENDIX A: MEMBERSHIP OF THE BOARD

The Board of Taxation comprises members appointed by the Treasurer. A maximum of seven members are appointed in their personal capacity from within the business and wider community. The Secretary to the Australian Treasury, the Commissioner of Taxation and the First Parliamentary Counsel are ex officio members.

The members of the Board during 2015-16 were:

4.1 Current members

4.1.1. Chair — Mr Michael Andrew

Mr Andrew was Chairman and CEO, KPMG International from May 2011 to July 2014. He is the first Australian CEO of one of the 'big four' accounting firms and the first to be based in the Asia-Pacific region. A partner in KPMG since 1988, Michael practiced in Tax Law and was Partner in Charge of KPMG Tax Practice 1995-2000 and was Partner in Charge of KPMG International Tax Centre in Amsterdam from 1992-1994. Michael was Chairman of KPMG Asia-Pacific and Chairman, KPMG Australia from 2007 until 2011.

Mr Andrew is a former member of the Business Council of Australia and the International Business Council of the World Economic Forum.

Mr Andrew has a degree in Law and Commerce from Melbourne University. He is a qualified Barrister and Solicitor of the Supreme Court of Victoria and Fellow of the Institute of Chartered Accountants. He was recently awarded an Honorary Doctor of Laws by Monash University and an Honorary Doctor of Commerce by Melbourne University.

Mr Andrew was appointed to the Board in January 2015.

4.1.2. Deputy Chair — Mr John Emerson AM

Mr Emerson is a consultant at Herbert Smith Freehills, and is widely recognised as a specialist in the tax and other laws applicable to charities. He heads the firm's charity law practice.

He is the firm's Melbourne Office Pro Bono Partner and a member of a number of legal, academic, and public sector committees active in the charity tax and pro bono areas.

Mr Emerson has been a member of the Board since January 2007 and was appointed Deputy Chair in May 2015.

4.1.3. Mrs Peggy Lau-Flux

Mrs Lau Flux enjoyed a successful career as a corporate banker before settling in Australia in 1992. Her key areas of expertise are finance and marketing in the international corporate banking sector with Asia Pacific Regional responsibilities, dealing with multinationals, manufacturers and traders. Her corporate governance experience covers the health and education sectors.

Mrs Lau Flux has a Master of Business Administration (University of Hong Kong) and Bachelor of Economics (University of Western Ontario). Over the course of her career she worked as a Corporate Banker for Citibank and Standard Chartered Bank in Hong Kong, and led noteworthy initiatives such as the installation of the first electronic banking system in China and the determination of risk asset weighting. Since her arrival in Australia she has served on many boards at both State and Federal levels, including the Royal Adelaide Hospital, the Council of International Trade and Commerce of SA, the Australia China Council, National Multicultural Advisory Council and was the President of the Asia Pacific Business Council for Women and the Chairperson of the Joanna Briggs Institute.

Currently Mrs Lau-Flux is a Council Member of Flinders University and a Director of Flinders Partners. She is also the Chairperson of the Finance and Investment Committee.

Mrs Lau Flux was appointed to the Board in January 2015.

4.1.4. Mr Neville Mitchell

Mr Mitchell is currently the President of the Group of 100; the peak body for Australia's senior finance executives from large private and public business enterprises.

Mr Mitchell has been Chief Financial Officer and Company Secretary of Cochlear Limited since its listing in 1995.

Mr Mitchell is a director of Osprey Medical Inc., the Hearing Cooperative Research Centre and a panel member of the NSW Government Medical Devices Fund.

Mr Mitchell is a member of the Chartered Accountants Australia and New Zealand.

Mr Mitchell was appointed to the Board in May 2015.

4.1.5. Ms Karen Payne

Ms Payne is a tax partner with Minter Ellison specialising in corporate, funds and international tax. She has over 20 years' experience as a taxation advisor at top tier legal and accounting firms. She is a Chartered Tax Adviser and member of Chartered Accountants Australia and New Zealand. She has a degree in Law and Commerce and Masters degree in Taxation, all from the University of New South Wales. She has extensive experience managing complex tax-related matters for major multinationals, publicly listed companies and Australian IPOs across the financial services, property, mining, energy and utilities sectors.

Ms Payne has been a member of the advisory panel of the Board of Taxation since 2010.

Ms Payne was appointed to the Board in May 2015.

4.1.6. Dr Mark Pizzacalla

Dr Pizzacalla is Partner-in-Charge of the Private Clients practice of BDO in Melbourne, and is integrally involved in the firm's Tax and Advisory practice.

Dr Pizzacalla's business experience, including acting as Managing Partner of his predecessor firm, gives him a strong appreciation of both the strategic and operational issues facing both SMEs and larger businesses.

Dr Pizzacalla completed his PhD in relation to the taxation of SMEs in Australia and is one of the few tax practitioners whose work has been cited in Australia's Parliament. He is also a member of The Tax Institute's Victorian Technical Committee, and was previously the former Chair of The Tax Institute's National SME Sub-Committee, as well as being a former Victorian State Councillor.

Dr Pizzacalla was appointed to the Board in January 2015.

4.1.7. Mrs Ann-Maree Wolff

Mrs Wolff has over 23 years of experience as a qualified tax professional with over 13 years of experience in senior tax roles within the mining industry. She is currently the Asia Pacific Head of Tax for Rio Tinto responsible for all tax matters relevant to Rio Tinto in Australia and the broader Asia Pacific region.

Mrs Wolff is a Chartered Tax Advisor and Fellow of Chartered Accountants Australia and New Zealand.

Mrs Wolff has been extensively involved in tax policy development in her roles on the Tax Committees for the Business Council of Australia and Minerals Council of Australia, the Executive Committee of the Corporate Taxpayers Association, as well as through consultation directly with the Australian Treasury.

Mrs Wolff was appointed to the Board in May 2015.

4.1.8. Mr Craig Yaxley

Mr Yaxley has over 30 years corporate tax experience including 20 years as a tax partner with KPMG Perth office. He was appointed WA State Lead Tax Partner on 1 July 2013. He provides tax advice to a wide range of international and Australian mining, oil and gas, mining services, property and agriculture clients on structuring inbound and outbound investments, financing, joint ventures and mergers and divestments.

Mr Yaxley is a Chartered Tax Advisor and Fellow of the Institute of Chartered Accountants in Australia. Through his previous role as Chairman of the Association of Mining and Exploration Companies Inc. (AMEC), Mr Yaxley has been actively involved in mining industry tax issues and policy developments.

Mr Yaxley is Treasurer and Director of Black Swan State Theatre Company.

Mr Yaxley was appointed to the Board in January 2015.

4.1.9. Mr John Fraser — Secretary to the Treasury

Mr Fraser commenced as Secretary to The Treasury in January 2015. He was Chairman and CEO of UBS Global Asset Management from late 2001 to 2013, based in London. During this time, he was also a member of the UBS Group Executive Board and Chairman of UBS Saudi Arabia. In 2014, Mr Fraser remained as Chairman of UBS Global Asset Management, Chairman of UBS Saudi Arabia and Chairman of UBS Grocon Real Estate.

Prior to joining UBS and its predecessor organisations in 1993, Mr Fraser served for over 20 years with the Australian Treasury, including as Deputy Secretary (Economic) from 1990 and postings at the International Monetary Fund and as Minister (Economic) at the Australian Embassy in Washington, DC. He was Chairman of Victorian Funds Management Corporation from 2009 to early 2015. In 2013, Mr Fraser was awarded an honorary degree of Doctor of Laws by Monash University, Melbourne.

Mr Fraser has been an ex officio member of the Board since December 2014.

4.1.10. Mr Chris Jordan AO — Commissioner of Taxation

Mr Jordan was appointed Commissioner of Taxation from 1 January 2013. He has extensive tax experience in public and private sector roles and has been an advisor to both sides of government on tax policy and implementation issues.

Mr Jordan was New South Wales Chairman of KPMG until his retirement in 2012. He has previously held positions as Chairman of the Business Tax Working Group, Chair of the New Tax System Advisory Board and State Chair of the New South Wales Division of the Taxation Institute of Australia.

Mr Jordan has also been Chairman of the Committee for Sydney, Board Member of the Bell Shakespeare Company and the Sydney Children's Hospital Foundation, and was appointed by the NSW Government to the Games Advisory Committee of the Sydney 2009 World Masters Games.

A Chartered Tax Advisor with the Tax Institute and a Fellow of the Institute of Chartered Accountants, Mr Jordan has a Master of Laws (Sydney) and Bachelors of Commerce and Law (UNSW).

Mr Jordan has been a member of the Board since its inception in September 2000. He was Deputy Chair from January 2005 and was appointed to the position of Chair in June 2011. He retired from this position in December 2012 following his appointment as Commissioner of Taxation, and then took up the position as an ex-officio member of the Board.

4.1.11. Mr Peter Quiggin PSM — First Parliamentary Counsel

Mr Quiggin is the First Parliamentary Counsel of the Office of Parliamentary Counsel (OPC), which is responsible for drafting all principal legislation, all regulations and a range of legislative instruments for the Australian Government, including taxation legislation. OPC is also responsible for the publication of Commonwealth legislation through ComLaw and the Federal Register of Legislative Instruments (FRLI).

Mr Quiggin's initial seven year appointment as First Parliamentary Counsel started on 13 May 2004. He has since been reappointed for a further seven years, commencing on 14 May 2011. He has been a drafter with the Office of Parliamentary Counsel for over 25 years and has drafted legislation covering a wide range of topics including taxation, native title and immigration.

Mr Quiggin is the President of the Commonwealth Association of Legislative Counsel.

Prior to working at OPC, Mr Quiggin worked for a number of years with the Tax Office and the Administrative Appeals Tribunal.

Mr Quiggin has been an ex officio member of the Board since January 2004.

4.2 Outgoing Board members

4.2.1. Outgoing Chair — Mrs Teresa Dyson

Mrs Dyson is a senior tax partner at Deloitte in Brisbane, advising clients on infrastructure, financing, corporate tax issues, M&A activity and tax controversy matters.

Mrs Dyson is Deputy Chair of the Business Law Section of the Law Council of Australia. Mrs Dyson is a member of the Audit & Risk Committee of Lifeline Australia.

Mrs Dyson was appointed to the Board in June 2011. Mrs Dyson was appointed to the position of Chair effective from January 2013. Mrs Dyson's term as Chair and member of the Board ended in December 2014.

4.2.2. Outgoing Deputy Chair — Mr Keith James (Deputy Chair)

Mr James is a Consultant at Hall & Wilcox Lawyers having retired as a partner in July 2014. He holds a number of current directorships and is a key figure in the tax advisory profession. His involvement has extended to Chair of the Public Accountants Committee and Victorian President and National Councillor and Chair of the Taxation Centre of Excellence for CPA Australia.

Mr James was the accounting profession representative on the Commissioner of Taxation's Advisory Panel, his National Liaison Committee and the Advisory Committee on the Taxpayers Charter. He was joint Chair of the working party on the national review of standards of the tax profession and a member of the steering committee of the Pappas Carter Report reviewing the Tax Office's large case audit program.

Mr James is an active public speaker within the industry and regularly has articles published in legal and accounting publications.

Mr James was appointed to the Board in March 2004 and appointed to the position of Deputy Chair in June 2011. Mr James' term as a member and Deputy Chair of the Board ended in December 2014.

4.2.3. Mr Curt Rendall

Mr Rendall is the Senior Partner of Rendall Kelly Chartered Accountants.

Mr Rendall was a member of the Standard Business Reporting Board, representing the Board of Taxation, and was previously a member of the Trade Practices Act Review (the Dawson Review), Chair of the Federal Government's Small Business Consultative Committee, Deputy Chair of the New Tax System Advisory Board and an Associate Commissioner of the Productivity Commission. He has also been Chair of the Institute of Chartered Accountants Small and Medium Enterprises Committee as well as a Member of the Small Business Development Corporation of New South Wales.

Mr Rendall was as a member of the Board from January 2005 until December 2014.

4.2.4. Ms Elizabeth Jameson

Ms Jameson is a corporate/commercial lawyer by background. After 15 years in legal practice, in 2002 she established Board Matters Pty Ltd, a corporate governance consultancy and associated legal practice, Board Matters Legal. Today Ms Jameson's time is divided between her consulting work through Board Matters and a number of non-executive Directorships. She has held many board positions over the past two decades. This currently includes directorships with RACQ Ltd, Brisbane Girls' Grammar School (as Chair) and is a member of the Board of Queensland Theatre Company (since May 2013).

Ms Jameson is also a member of the Queensland Law Society and fellow of the Australian Institute of Company Directors.

Ms Jameson was a member of the Board from April 2010 until December 2014.

4.2.5. Dr Martin Parkinson PSM

Dr Martin Parkinson was appointed as Secretary to the Treasury in March 2011.

As Secretary, he was a member of the Board of the Reserve Bank of Australia, Chair of the Advisory Board of the Australian Office of Financial Management and a member of the Australia in the Asian Century Strategic Advisory Board, Infrastructure Australia, the Council of Financial Regulators, the Board of Taxation, the Sir Roland Wilson Foundation and the Centre for International Finance and Regulation.

Dr Parkinson was the Secretary of the Department of Climate Change from its establishment in December 2007, and headed up the Climate Change Group in the Department of the Prime Minister and Cabinet earlier in 2007.

Between 2001 and 2006, Dr Parkinson was Deputy Secretary in Treasury with responsibility for domestic and international macroeconomic issues, including serving as co-chair of the G-20 Deputies process in 2006.

He holds a Ph.D. from Princeton University, a M.Ec from the Australian National University and a B.Ec (Hons) from the University of Adelaide.

Dr Parkinson was an ex officio member of the Board from March 2011 until December 2014.

4.2.6. Secretary to the Board of Taxation — Mr Matthew Brine

Mr Brine became Secretary to the Board of Taxation in January 2014. Mr Brine has had almost 20 years of experience working on public policy issues, with a focus on business taxation and corporate law. His recent experience includes leadership roles in projects relating to the taxation of consolidated groups, taxation of financial arrangements, taxation of managed investment trusts, resource taxation, the dividend imputation regime and the taxation of infrastructure projects.

5. APPENDIX B: THE BOARD'S CHARTER

5.1 Mission

Recognising the Government's responsibility for determining taxation policy and the statutory roles of the Commissioner of Taxation and the Inspector-General of Taxation, the Board's mission is to contribute a business and broader community perspective to improving the design of taxation laws and their operation.

5.2 Membership

Members of the Board will be appointed by the Treasurer, for a term of up to three years, based on their personal capacity. It is expected that members will be appointed from within the business and wider community having regard to their ability to contribute at the highest level to the development of the tax system. The Chair will be appointed by the Treasurer from among these members of the Board. If the Treasurer decides to appoint a Deputy Chair, he or she will also be appointed from among these members of the Board. Members may be re-appointed.

In addition, the Secretary to the Department of the Treasury, the Commissioner of Taxation and the First Parliamentary Counsel will also be members of the Board. Each may be represented by a delegate

5.3 Function

The Board will provide advice to the Treasurer on:

- the quality and effectiveness of tax legislation and the processes for its development, including the processes of community consultation and other aspects of tax design;
- improvements to the general integrity and functioning of the taxation system;
- research and other studies commissioned by the Board on topics approved or referred by the Treasurer; and
- other taxation matters referred to the Board by the Treasurer.

5.4 Relationship to other boards and bodies

From time to time the Government or the Treasurer may establish other boards or bodies with set terms of reference to advise on particular aspects of the tax law. The Treasurer will advise the Board on a case-by-case basis of its responsibilities, if any, in respect of issues covered by other boards and bodies.

5.5 Report

The Chair of the Board will report to the Treasurer, at least annually, on the operation of the Board during the year.

5.6 Secretariat

The Board will be supported by a secretariat provided by the Treasury, but may engage private sector consultants to assist it with its tasks.

5.7 Other

Members will meet regularly during the year as determined by the Board's work program and priorities.

Non-government members will receive remuneration and allowances to cover travelling and other expenses, at rates in accordance with Remuneration Tribunal determinations for part-time public offices.

The Government will determine an annual budget allocation for the Board.

6. APPENDIX C: ATTENDANCE AT BOARD MEETINGS

Table 2: Attendance at Board meetings, 2014-15

Member	Number of meetings eligible to attend	Number of meetings attended
Mrs Dyson (Outgoing Chair)	6	6
Mr James	6	6
Ms Jameson	6	6
Mr Rendall	6	6
Dr Parkinson ^(a)	6	6
Mr John Fraser ^(a)	5	5
Mr Jordan ^(a)	11	11
Mr Quiggin ^(a)	11	11
Mr Andrew (Chair)	5	5
Mr Emerson	11	11
Mrs Lau Flux	5	5
Dr Pizzacalla	5	5
Mr Yaxley	5	5
Mr Mitchell	2	2
Mrs Wolff	2	2
Ms Payne	2	2

(a) The Board's Charter allows for ex officio members of the Board to be represented by a delegate at Board meetings.

7. APPENDIX D: BOARD WORKING GROUPS

Table 3: Membership of Board Working Groups, 2014-15

Completed references

Post-implementation review of Division 7A of Part III of the <i>Income Tax Assessment Act 1936</i>	Review of the debt and equity tax rules
Mr Rendall (Chair)	Mrs Dyson (Chair)
Mr James	Mr Emerson
Ms Jameson	

Review of thin capitalisation arm's length debt test	Review of tax impediments facing small business
Ms Jameson (Chair)	Mr Emerson (Chair)
Mrs Dyson	Mrs Dyson
Mr James	Mr Rendall

Scoping review of the Taxation of Financial Arrangements regime
Ms Dyson (Chair)

New references

Development of a tax transparency code	Consultation on the implementation of anti-hybrid rules in Australia
Mr Andrew (Chair)	Ms Payne
Mr Emerson	
Mrs Wolff	
Mr Mitchell	

Broader work of the Board

Deregulation (including FBT)	Regulatory Performance Framework
Mr Quiggin (Chair)	Mr Mitchell (Chair)
Mr Yaxley	Mr Emerson
Dr Pizzacalla	
Mr Mitchell	

Tax White Paper working group on international tax	Tax White Paper working group on large business tax
Mrs Wolff (Chair)	Mr Yaxley (Chair)
Ms Payne	Mrs Wolff
Ms Lau Flux	Mr Mitchell

Tax White Paper working group on small business tax	
Dr Pizzacalla (Chair)	Mr Emerson

8. APPENDIX E: CONSULTATION BY THE BOARD

Table 4: Speeches and presentations, 2014-15

Date	Presentation	Event	Member
3 July 2014	Presentation, 'Tax Reform Update in the Light of the Government's Announcements and Consultations'	Tax Institute, Qld Corporate Tax Retreat	Mrs Dyson
11 August 2014	Roundtable	Treasury Deregulation Roundtable	Mrs Dyson
22 August 2014	Panel discussion	Panel discussion for ATO Law Design and Practice Workshop	Mrs Dyson
25 August 2014	Meeting	Meeting with BCA	Mrs Dyson, Mr Jordan
26 August 2014	Roundtable	CCH Heads of Tax Roundtable	Mrs Dyson
28 August 2014	Presentation	Tax Institute WA State Convention	Mrs Dyson
9-10 September 2014	Roundtable on 'Tax Integrity'	Griffith University — Global Integrity Summit	Mrs Dyson
9 October 2014	Introductory Plenary	Tax Institute Victorian Annual Tax Forum	Mrs Dyson
20 October 2014	Panel discussion	IPA/Deakin University — Small Business Conference	Mr Emerson
23 October 2014	Board of Taxation: An update for SMEs	Tax Institute NSW Tax Symposium	Mrs Dyson
12 November 2014	Panel discussion	Tax Institute, Brisbane Women in Tax panel	Mrs Dyson, Ms Jameson
17-18 November 2014	'Finalising and Implementing the BEPS Agenda'	Sydney University Law School	Mrs Dyson
28 November 2014	Presentation	Institute of Public Accountants National Congress	Mr James
28-29 May 2015	Presentation, 'The thin capitalisation arm's-length debt test — where to from here?'	Aventedge Transfer Pricing Summit	Ms Payne
5 June 2015	Panel discussion	BCA Economics Committee	Mr Andrew

Table 4: Speeches and presentations, 2014-15 (continued)

Date	Presentation	Event	Member
11-12 June 2015	Presentation, 'Review into tax system impediments facing small business'	Tax Institute, 2015 Private Business Tax Retreat	Mr Andrew
23-24 June 2015	Presentation	AMEC Convention	Mr Yaxley

Table 5: Meetings with external organisations, 2014-15

Date	Attendees
11 July 2014 (Perth)	
Consultation meetings to discuss the Board's review of the arm's-length debt test	Ms Jameson, Mr Emerson, members of the arm's-length debt test Working Group, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat and stakeholder representatives
17 July 2014 (Perth)	
Consultation meetings to discuss the Board's review of the arm's-length debt test	Ms Jameson, Mrs Dyson, Mr James, members of the arm's-length debt test Working Group, Board of Taxation Secretariat and stakeholder representatives
18 July 2014 (Perth)	
Board of Taxation meeting	Perth-based stakeholder representatives and members of the Board's Advisory Panel
14 August 2014 (Sydney)	
Consultation meetings to discuss the Board's review of the debt/equity rules	Mrs Dyson, Mr Emerson, members of the Debt/Equity Working Group, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat and stakeholder representatives
15 August 2014 (Sydney)	
Board of Taxation meeting	Senator the Hon Mathias Cormann Sydney-based members of the Board's Advisory Panel
20 August 2014 (Sydney)	
Consultation meetings to discuss the Board's review of the debt/equity rules	Mrs Dyson, Mr Emerson, members of the Debt/Equity Working Group, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat and stakeholder representatives
12 September 2014 (Canberra)	
Board of Taxation meeting	Officials from Treasury and the Australian Taxation Office
17 September 2014 (Adelaide)	
Board of Taxation meeting	Adelaide-based business representatives and members of the Board's Advisory Panel

Table 5: Meetings with external organisations, 2014-15 (continued)

Date	Attendees
7 November 2014 (Melbourne)	
Board of Taxation meeting	Melbourne-based business representatives and members of the G100 and the Board's Advisory Panel
20 November 2014 (Sydney)	
Consultation meetings to discuss the Board's review of the debt/equity rules	Mrs Dyson, Mr Emerson, members of the Debt/Equity Working Group, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat and stakeholder representatives
10 February 2015 (Video conference)	
Briefing on the Tax White Paper	Mr Andrew, Board of Taxation Secretariat, officers from the Treasury
4 March 2015 (Sydney)	
Consultation on Base Erosion and Profit Shifting issues	Mr Andrew, Mrs Lau Flux, Mr Yaxley, Board of Taxation Secretariat and stakeholder representatives
10 March 2015 (Melbourne)	
Consultation on Base Erosion and Profit Shifting issues	Mr Andrew, Mr Yaxley, Board of Taxation Secretariat and stakeholder representatives
20 March 2015 (Canberra)	
Board of Taxation meeting	Officials from Treasury
24 March 2015 (Sydney)	
Consultation on Base Erosion and Profit Shifting issues	Mr Andrew, Board of Taxation Secretariat and stakeholder representatives
17 April 2015 (Melbourne)	
Board of Taxation meeting	The Hon Josh Frydenberg MP Officials from Treasury Melbourne-based business representatives and members of the G100 and the Board's Advisory Panel
5 May 2015 (Sydney)	
Consultation meetings to discuss the Board's Tax White Paper international tax working group's project on tax reform	Mrs Wolff, Mrs Payne, Mr Yaxley, members of the Large Business and International tax working groups, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat and stakeholder representative Sydney-based stakeholder representatives
6 May 2015 (Sydney)	
Consultation meetings to discuss the Board's Tax White Paper small business tax working groups' projects on tax reform	Dr Pizzacalla, Mr Emerson, members of the Small Business tax working groups, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat and stakeholder representative Sydney-based stakeholder representatives

Table 5: Meetings with external organisations, 2014-15 (continued)

Date	Attendees
<p>8 May 2015 (Melbourne)</p> <p>Consultation meetings to discuss the Board's Tax White Paper small business tax working groups' projects on tax reform</p>	<p>Dr Pizzacalla, Mr Emerson, members of the Small Business tax working groups, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat and stakeholder representative</p> <p>Melbourne-based stakeholder representatives</p>
<p>13 May 2015 (Canberra)</p> <p>Board of Taxation meeting</p>	<p>Officials from Treasury</p>
<p>15 May 2015 (Canberra)</p> <p>Consultation meetings to discuss the Board's Tax White Paper small business tax working groups' projects on tax reform</p>	<p>Dr Pizzacalla, Mr Emerson, members of the Small Business tax working groups, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat and stakeholder representative</p> <p>Canberra-based stakeholder representatives</p>
<p>18 May 2015 (Adelaide)</p> <p>Consultation meetings to discuss the Board's Tax White Paper small business tax working groups' projects on tax reform</p>	<p>Dr Pizzacalla, Mr Emerson, members of the Small Business tax working groups, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat and stakeholder representative</p> <p>Adelaide-based stakeholder representatives</p>
<p>18-19 May 2015 (Melbourne)</p> <p>Consultation meetings to discuss the Board's Tax White Paper international and large business tax working groups' projects on tax reform</p>	<p>Mrs Wolff, Mr Yaxley, Ms Payne, Mrs Lau Flux, members of the Large Business and International tax working groups, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat</p> <p>Melbourne-based stakeholder representatives</p>
<p>19-20 May 2015 (Sydney)</p> <p>Consultation meetings to discuss the Board's Tax White Paper international and large business tax working groups' projects on tax reform</p>	<p>Ms Payne, Mrs Lau Flux, Mrs Wolff, members of the Large Business and International tax working groups, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat</p> <p>Sydney-based stakeholder representatives</p>
<p>2 June 2015 (Melbourne)</p> <p>Consultation meetings to discuss the Board's review of the Fringe Benefits Tax rules</p>	<p>Mr Quiggin, Mr Andrew, Officers from the Australian Taxation Office and Treasury, Board of Taxation Secretariat and stakeholder representatives</p> <p>Melbourne-based stakeholder representatives</p>
<p>19 June 2015</p> <p>Board of Taxation meeting</p>	<p>Brisbane-based business representatives and members of the Board's Advisory Panel</p>

9. APPENDIX F: CONSULTANCIES

Consultants are engaged in accordance with Treasury's policies for the engagement of consultants and contractors. These policies, which are consistent with the Chief Executive Instructions and the Commonwealth Procurement Guidelines, are outlined in the Treasury Annual Report. During 2014-15, the Board engaged three consultancies for an amount over \$10,000, for a total value of \$66,000 (GST inclusive). The actual expenditure for these consultancies, consultancies completed in 2014-15 and for payments made to service providers in 2014-15, was \$92,367 (GST exclusive).

10. APPENDIX G: FINANCIAL STATEMENTS

Table 6: Revenue, expenses and operating result

	2013-14	2014-15
	\$	\$
Revenue		
Funding from Government ^(a)	1,524,083	1,588,234
Revenue — Other	152,759	185,032
Total revenue	1,676,842	1,773,266
Expenses		
<i>Employee expenses^(b)</i>		
Wages	421,895	351,038
Superannuation	113,975	94,606
Other employee expenses	371,851	383,108
Total employee expenses	907,721	828,752
<i>Other expenses</i>		
Travel	208,293	256,360
Conferences and training	24,671	18,026
Consultants and Contractors	134,507	92,367
Seconded Employees	242,911	311,538
Office supplies	456	1,248
Publications and subscriptions	2,264	756
Other supplier expenses	6,339	7,180
Total operating expenses	619,441	687,475
Total expenses	1,527,162	1,516,227
Operating surplus	149,680	257,039

(a) This represents the revised budget allocation for Board of Taxation following Treasury's internal mid-year budget review. The 2013-14 comparable has been amended to reflect this in the 2014-15 annual report.

(b) Of total employee expenses of \$828,752 in 2014-2015, \$461,779 was attributed to the Secretariat. The 2014-2015 average staffing level of the Secretariat was 3.1. The balance of \$366,973 comprises payments to non-Government members of the Board.

Table 7: Salary paid to non-government Board members, 2014-15

Member	\$
Mrs Dyson (Chair from January 2013 till December 2014)	\$62,902
Mr Andrew (Chair from January 2015 till current)	\$53,916
Mr Emerson	\$58,409
Mr James	\$31,451
Ms Jameson	\$31,451
Mr Rendall	\$28,917
Mrs Lau-Flux	\$26,958
Mr Yaxley	\$26,958
Dr Pizzacalla	\$26,958
Mr Mitchell	\$6,351
Ms Payne	\$6,351
Mrs Wolff	\$6,351
Total	\$366,973

11. APPENDIX H: MEMBERS OF THE BOARD'S ADVISORY PANEL

Table 8: Members of Advisory Panel as at 30 June 2015

Panel Member	Position, Organisation
Mr Stephen Baxter	Director, Indirecttax.net
Mr Patrick Broughan	Partner, Deloitte
Mr Michael Carruthers	Tax Services Director, Hayes Knight
Mr Andrew Clements	Partner, King & Wood Mallesons
Mr John Condon	Regional Tax Manager — Australia & New Zealand, BP Australia
Mr Stewart Cummins	Chief Executive Officer, Vocation
Ms Kristen Deards	Barrister, Banco Chambers
Mr Michael Flynn	Barrister
Dr Brett Freudenberg	Associate Professor — Taxation, Griffith University
Mr Mark Friezer	Partner, Clayton Utz
Mr Tony Frost	Managing Director, Greenwoods & Freehills
Mr Peter Godber	Partner, Grant Thornton
Mr Mark Goldsmith	Partner, Deloitte
Ms Heather Gray	Partner, Hall & Wilcox
Mr Don Green	Partner, Ernst & Young
Mr Patrick Grob	Partner, Deloitte
Mr Michael Hay	Partner/Executive Director, Pitcher Partners
Mr Stephen Healey	Partner, Deloitte
Mr Paul Hooper	Group Head of Tax, Lend Lease
Mr Nick Houseman	Partner, PwC
Mr Trevor Hughes	Partner, Ernst & Young
Mr Anthony Klein	Partner, PwC
Mr Michael Lawry	Head of Tax, Santos
Mr Adam Levin	Partner, Jackson McDonald Lawyers
Mr Michael Longes	Head of Tax, Sunsuper Pty Ltd
Mr James Macky	Partner, KPMG
Mr Larry Magid	Partner, Allens
Ms Louise McBride	Barrister

Table 8: Members of Advisory Panel as at 30 June 2015 (continued)

Panel Member	Position, Organisation
Ms Anthea McKinnell	Taxation Manager, Woodside Energy Ltd
Mr Mark Molesworth	Partner, BDO Australia
Professor Ann O'Connell	Co-Director Tax Group, Melbourne Law School
Mr Frank O'Loughlin	Barrister
Ms Katrina Parkyn	Partner, Allens Linklaters
Mr Trevor Pascall	Partner, KPMG
Professor Dale Pinto	Professor of Taxation Law, Curtin Law School, Curtin University
Mr Anthony Portas	Head of tax, Asia Pacific, Anglo American Metallurgical Coal Pty Ltd
Mr Tony Principe	Group Manager, Taxation, Origin Energy
Mr Richard Richards	Chief Financial Officer, Seven Group Holdings
Mr Hayden Scott	Partner, PwC
Mr Jeff Shaw	Senior Manager, National Australia Bank Ltd
Mr Andrew Smith	Barrister, University Chambers
Mr Ken Spence	Special Counsel, Greenwoods & Freehills
Mr Simon Steward SC	Barrister, Aickin Chambers
Ms Ruth Stringer	Partner, King & Wood Mallesons
Ms Judy Sullivan	Partner, PwC
Mr Reynah Tang	Partner, Johnson Winter & Slattery
Mr William Thompson	Managing Partner, Brisbane, Minter Ellison
Ms Coralie Trotter	Business Tax Manager, Shell Development Australia) Pty Ltd
Mr Grant Wardell-Johnson	Partner, KPMG
Mr Mark West	Partner, McCullough Robertson
Mr Steve Westaway	Partner, Grant Thornton
Mr Ken Woo	Partner, PwC

