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Ken Kua  
Director  
Tax Practitioner Projects and Initiatives  
Individuals and Intermediaries  
ATO

By email: [LodgmentProgramReviewWorkingGroup@ato.gov.au](mailto:LodgmentProgramReviewWorkingGroup@ato.gov.au)

Dear Ken,

## **Pressure points for agents under the ATO lodgment program**

CPA Australia represents the diverse interests of more than 168,000 members, working in over 100 countries and regions supported by 19 offices around the world. We make this submission on behalf of our members and in the broader public interest.

We make this submission to the Lodgment Program Review Working Group (the Working Group) to provide the profession's views on the pressure points under the ATO lodgment program. Extensive member views were received by us through our Tax News e-newsletter on 9 December 2021 and 13 January 2022, member committees and direct member engagement.

There is overall recognition that the Lodgment Program does seek to spread lodgment obligations throughout the year and that there is little room to adjust, as illustrated in the Registered Agent Lodgment due dates document provided to the Working Group members. While a number of dates and obligations have been identified as specific pressure points, the underlying issue remains the lack of flexibility and ability to self-manage lodgments when pressures become apparent.

Tax practitioners have consistently told us that they aim to manage their clients' lodgments effectively and it is in their business interests to do so. Therefore, on the occasions when they require additional time, they wish to do this in the most efficient manner and as independently of the ATO as possible. Their focus is primarily on the improvement of performance metrics, deferral processes and ATO engagement approaches, as opposed to necessarily shifting due dates across the Lodgment Program. A member described it as follows:

"To be a tax agent these days you need to be a robot, Penn & Teller and Dynamo rolled into one. The ATO needs to let us get on with our work and allow us to catch up with our lodgments without all the changes being implemented on top of that or there won't be any tax agents to support the system."

Tax practitioners also demonstrate a limited understanding of the ATO's assurance approach to tax agents and its response to performance below the 85 per cent benchmark. Failure to maintain the 85 per cent benchmark causes great stress and anxiety, particularly because tax practitioners are uncertain of the potential consequences. While the ATO has provided assurances about its approach to the Tax Practitioner Stewardship Group (TPSG) and the Working Group, this is not common knowledge to tax practitioners and confidentiality requirements constrain external members of the TPSG and the Working Group from providing further details or reassurance.

In our view, and as reflected in feedback from members, it is the measurement of lodgment performance and its consequent impact on access to deferrals and the application of penalties and interest that is the core issue. External factors such as the increasing scope of the Commissioner's role and associated growing compliance obligations are a matter for Government and the Treasury. It is the treatment of tax practitioners and the use of the Commissioner's discretionary powers to maintain stability and support of the tax and superannuation systems over which the ATO has most influence. As such, the administrative framework should be designed to encourage and promote progressive lodgment while empowering tax practitioners to manage their client base professionally and without undue pressure exerted by the ATO.

Feedback from members identifies the following as areas of significant concern:

- The ATO's policy of automatically removing the concessional due date for those who have not lodged the prior year's return. This creates additional pressure for practitioners who are expected to service both early lodgers as well as deal with those late lodgers who have lost the concessional due date.
- Small and medium businesses do not necessarily have the capability or resources to keep on top of their many obligations, meaning their tax practitioners spend significant time educating, checking, chasing and communicating with clients. Depending on various circumstances outside of the practitioner's control, they may (or may not) be able to keep their lodgment performance on track.
- Tax practitioners and taxpayers remain significantly affected by COVID-19 and the inability, real or perceived, for the ATO to accommodate greater variance in the lodgment performance of practitioners is a cause of stress and frustration.
- Those accessing the Supported Lodgment Program should experience a reasonable and tailored approach across all of their clients and obligations with the ATO case manager and practitioner working together, potentially over a period of months, to manage their lodgment program. The ATO should ensure that ATO systems are updated so that practitioners in the program do not receive calls or communications initiated by other areas of the ATO (e.g., Lodge and Pay) and ATO staff should engage prior to deferred due dates to update lodgment programs to prevent immediate and aggressive ATO action being taken once those dates pass.
- The much-reported shortage of skilled staff across the profession means practitioners are risking burnout to satisfy ATO requirements and support their clients. The rapid changes to the tax compliance and service delivery landscape are creating additional workloads that exceed the efficiencies that arise from digital transformation and ATO investment in improved services.
- Practitioners are not inclined to reject new clients or jettison clients in difficulty. This means that they compromise their lodgment percentage in order to bring taxpayers up to date with their obligations. It also means that they consume their own resources to support those struggling with their tax affairs.
- There doesn't appear to be recognition of the "real experience" of tax practitioners who are usually also accountants, ASIC agents and financial advisors. Tax and superannuation reporting obligations are only one aspect of their operations and the Lodgment Program, and ATO more generally, should take this into consideration when setting performance expectations for practitioners.

The broader issue of payment dates determining the timing of lodgments has also been raised. Given that income and fringe benefits tax return liabilities are wash-up payments with the majority paid through the instalment and withholding regimes, allowing lodgments to occur prior to the lodgment due date without bringing forward payment due dates can assist tax practitioners manage their clients as well as facilitate the earlier provision of information to the ATO without detriment to government revenue.

While the insights and experiences from our members are essential, we believe that the ATO's data analytics capability should also be better utilised to identify pressure points across the system. Information on percentage on-time lodgment for each obligation with an analysis of the due dates when performance drops below the 85 per cent benchmark provides objective evidence upon which recommendations can be based. The absence of performance data across the range of lodgment obligations limits the ability of the external Working Group members to provide informed comment.

Attachment One contains de-identified member responses to the questions posed by the ATO regarding pressure points. Given the inter-related nature of the ATO's questions, responses may address more than one question.

Real examples and selected comments received from members regarding the Lodgment Program and the ATO's engagement with tax agents more broadly are contained in Attachment Two. These examples present the views from the profession and can inform Working Group discussions.

If you have any queries about this submission, contact Elinor Kasapidis, Senior Manager Tax Policy on 0466 675 194 or [elinor.kasapidis@cpaaustralia.com.au](mailto:elinor.kasapidis@cpaaustralia.com.au).

Yours sincerely,



Dr Gary Pflugrath  
Executive General Manager  
Policy and Advocacy

Our responses to the questions put by the ATO are as follows.

### 1. Where are the pressure points on the timeline?

Depending on the practice profile, client composition and the types of obligations held across the client base, the pressure points will differ. The greatest common issue is the overall burden created by the many tax, superannuation and other reporting/regulatory obligations with which clients must comply, particularly small and medium businesses (SMEs).

Specific pressure points identified by members are as follows.

- As a small public accounting firm, we have found it increasingly difficult over the last few years to work through the July – September period due to the extensive list of requirements that need to be lodged or finalised in that period. Even without the extra pressure of the pandemic, we have found this period extremely stressful with expectations of us by both the ATO program and our clients being unrealistic. During that period, we need to:
  - lodge the June quarter superannuation documents for those clients that rely on us to do it,
  - check, reconcile and finalise STP and income statements and lodge with the ATO,
  - prepare the June quarter BAS,
  - determine, prepare and lodge the Taxable Payment Annual Report for all relevant clients, and
  - deal with the flood of individual returns that come in immediately after the end of the financial year to get their tax done.
- The critical pressure points are due dates for 31st October and 15th May. There is also pressure during each BAS cycle. The 31st October pressure is created when clients who are late one year lose concessional lodgment due dates the following year. There may be various valid reasons why they were late in one year, but it changes the whole cycle for that lodger, who may typically lodge later in the year. Unfortunately, we often find this new date is unachievable for many of our clients who are then in a permanent cycle of late lodgments. This adds pressure to our list as more clients are gradually added to this list each year. This pressure is particularly acute for SMSFs or clients invested in managed funds who may have only received their annual tax statements in early September. Further, the issue of late lodgment has greater consequences for SMSFs as they may lose their complying status and no longer be able to accept contributions.
- Large companies currently have an income tax payment due date of 1 December and income tax return lodgment due date of 15 January (17 January next year). From our perspective, we work to have the financial statements and income tax return completed before 1 December to advise the client of the income tax payment estimate to be made. This can be a very rushed deadline. I know we can ask the client to pay a rough estimate first and pay any difference paid or have an overpaid amount refunded once we know the final amount. A payment due date the same as the tax return of 15 January would make more sense, just like the 31 March and 15 May deadlines.
- Lodgments due on 15 January still require payment on 1 December which makes no sense. You cannot know the tax due until you have completed the tax return, meaning the work needs to be undertaken in November at the latest, which impacts on other parts of our work program.
- The 31 March due date for certain entities will generally bring forward the due date for all entities in that group, particularly those with the 15 May due date. In order to determine the tax liabilities across the group, we have to do all entities which makes the May due date irrelevant and puts great pressure on tax agents.
- The time given to balance and correct end-of-year pay information between STP and PAYGW is too tight.
- The fringe benefits tax (FBT) year should change to align with the income tax year. In the modern digital world, the historical basis of the staggered dates is no longer relevant and causes more hassle than benefit.
- My main issue with the lodgment programme is that if 2020 tax returns are not lodged the ATO brings forward the lodgment date for 2021 tax returns. This prevents us from achieving our KPI targets for the next financial year. Our percentages decrease even before the year starts. I propose that if we are behind in our 2020 returns that the ATO should not bring forward the 2021 tax return lodgment dates. They should allow the lodgment date to remain as is to give us breathing space in order to catch up and get back on track. Bringing the lodgment dates forward is creating more pressures for us accountants. It is unreasonable for the lodgment dates to be brought forward as there are so many other pressures that we have to deal with at the moment. Also, by leaving the lodgment dates for 2021 tax returns in May 2022 it allows us to meet our KPI targets and we can also have a break which is important for our mental health as well as that of our clients, all of whom have been struggling.

## 2. What are the causes of the pressure for that particular time?

A range of behaviours can result in pressures, from the cumulative impact of individual events (e.g., new clients, vulnerable and distressed clients), increased responsibilities of tax agents/accountants (e.g., COVID stimulus and support measures) and implementation of new programs (e.g., Modernising Business Registers, STP Phase 2). Each practitioner will experience pressures at different times and to a differing extent, but the common theme is that a Lodgment Program that better accommodates the diversity of practitioners and their clients, recognises the increasing delivery of government programs through the tax and superannuation systems and takes a more empathetic and understanding approach to practitioners is needed.

Specific causes identified by members are as follows.

- After the 2020 lockdowns, a higher number of clients than usual failed to lodge their 2020 tax returns on time. While they want to be compliant, they forgot due to other, more urgent priorities. It is likely the same is going to happen for 2021 returns. While this is driven by client behaviour, it is the tax practitioner whose performance metric is affected.
- When we get new clients after 31 October they are nearly guaranteed to be lodged late. Yes, there is an extension of six weeks for new clients but that only gets us to mid-December. Why do new clients have to be on a tax agent list as at 31 October to get the extension to 15 May? If the tax return is lodged by a tax agent, there should be an automatic extension to 15 May. This does not negatively affect the ATO and would help us out dramatically for taking on new clients.
- We had a super fund this year which was a new registration. The rollover only came in July so we thought it would be a nil lodgment advice, but they received some employer contributions before 30 June and had to lodge a tax return. We did the ABN on setup and they were on our tax agent list but had a lodgment due date of 31 October? We have requested the ATO to correct this to 28 February (as it should be) but have heard nothing back.
- When a client comes in and prior year returns have to be done. While this is not so bad when it is an existing client because you are already aware of their circumstances, when it is a new client, they don't tell you the full story and it takes time to obtain the necessary information and exercise reasonable care.
- As a result of COVID lockdowns and restrictions, some clients have delayed visiting their accountants and/or have struggled to prepare tax returns remotely. The workload involved in preparing a tax return remotely is significantly higher (up to a factor of 20) due to the back-and-forth questions and documentation that needs to be located, scanned, reviewed and checked.

## 3. Are there specific obligations that create greater pressure points?

As reflected in the responses to the first question, income tax returns remain the most time-intensive activity and create pressures at different points in the annual cycle depending on the practice and range of client obligations.

Responses related to other obligations include:

- Super guarantee payment due dates are also an issue. They should also be included in the quarterly BAS and the currently outrageous penalties should be removed if paid within, say, seven days of the end of the next BAS period. The current deadlines and penalties are overkill, all because of the worst two per cent of employers who default on their obligations.
- Activity statements followed by STP. Then tax returns due between December and March.

## 4. What client group are the most impacted and the key factors that result in this impact?

Our members service all taxpayer groups across all income levels, and they indicate that, again, there are different pressures across the markets which can impact all of them in significant ways. For example:

- Individuals who have not lodged on time the prior year or are a new client don't have access to the concessional due date of 15 May but need to get lodgments up to date. They will either be serviced ahead of other, on-time clients so as not to affect the practitioner's lodgment percentage (thereby disadvantaging on-time lodgers with access to the concessional date) or lodge late by default and be subject to potential failure to lodge penalties and interest.
- Small businesses who do not have the skills or financial resources to necessarily be able to easily comply with their increasing reporting obligations. COVID-19 has significantly affected many businesses – financially and emotionally – and they are not necessarily able to work with their tax agent in a timely way to maintain on-time lodgment compliance. The application of penalties and removal of concessional dates for such taxpayers at this time would harm both the business and their tax agents.
- Medium businesses often experience similar challenges as small businesses but often have larger group structures and more complex tax issues. For those in Private Wealth, the increasing reporting requirements (e.g., Reportable Tax Position Schedule, International Dealings Schedule) require significant time and financial investment in tax return

preparation and lodgment. Due to the related nature of many group entities, the whole group's tax returns need to be done by the earliest lodgment due date in the group.

Feedback from members includes:

- SMEs. They feel significant pressure with their compliance work and are left with less time to actually work their business. The additional compliance pressure has also seen a significant increase in their accountancy fees, which many cannot afford.
- Many of our on-time lodgers aim to lodge their tax before 31st October each year despite our concessional dates. They, rightly so, do not like having their work lose priority to focus on clients who have been late. We have had many upset SMSF trustees who cannot have their work completed in a timely manner because we must dedicate most of September and October to late lodgers.
- Another group of clients impacted by 31st October due dates are new clients who have engaged us as a tax agent after the 31st October due date. They are already late then, and we are adversely impacting our lodgment program statistics by accepting them as a new client. Our concessional due dates should not be put at risk for our clients because we accept a new engagement. It would also incentivise taxpayers to engage a tax agent if they are already late and gain access to the tax agent's concessional due dates in that first year. This incentive is good for the ATO if more taxpayers bring their lodgment obligations up to date.

#### **5. How are agents and their clients currently managing the pressure points?**

- During the July to September period, we often start work at or before 6am and finish well into the evening, often waking up in the middle of the night and working on tax returns from home just to get through them. It is very unhealthy and not a long-term solution. We have been unable to find additional staff over the last year, and we know through our clients that there is a lack of available employees from which to draw generally. Living in rural Victoria makes finding appropriate staff perhaps more difficult than living in the big cities.
- Currently we deal with this situation by not seeing any individual tax return appointments until the 1st August, for which we have lost clients and also had to deal with instances of very unhappy clients. It is a really terrible time for public accounting firms, and it does make going to work very stressful.
- Employees are feeling overwhelmed by the amount of workload and constant pressure of deadlines. As the practice owner, I work from before dawn most mornings and most weekends. How many ATO staff do that? We get the work done because we feel an obligation to the client to do the best we can for them. But at what personal cost? The ATO does not understand the impact of these deadlines on people's day to day lives.
- We are in constant contact with our clients and letting them know what we must do for them. We are mindful that we are constantly nagging them for information to meet deadlines. They are busy trying to run their businesses and often don't have the time to deal with our questions immediately. Once we get the information back from the client, we then put the pressure back on our own staff to make sure the job is done in the required timeframe.
- The additional stress that we have had over the last two years has affected our mental health and if no one is supporting us then you will find a lot of accountants will end up leaving the industry because of the pressure. You will also find a lot of accountants will become sick because of burnout. There needs to be more support from the ATO especially for our mental health. No one likes to be behind in lodgments but at the same time we are all doing what is humanly possible. Our concerns need to be addressed because we are all working so hard and are burning ourselves out and I find that we have no support.
- The rolling and constant due dates make it impossible to take any time off work. It's not that easy to get more staff so you rely on those already working for you to do the work which also leads to excessive leave accruals and no time off for staff.
- We have to wait for taxpayer to provide information to us and they are often busy operating their business, health issues, on holidays or staffing issues. We know we can request extensions, but this also takes time. We spend way too much time administering the work instead of doing the work.
- Many accountants have retired in the last 12 months due to the sustained pressures and increasing workload associated with government policies delivered through the tax and superannuation systems, which has compounded the impacts of the growing complexity and volume of ATO administrative requirements.

**Selected comments on the ATO Lodgment Program provided in confidence to the ATO and Lodgment Program Review Working Group members**

**Examples**

***Onboarding new clients with unexpected obligations***

A new client said he had not done tax returns for three years and had three rental properties. However, after checking Online Services for Agents, it was found that there were four years outstanding for the client as well as his wife, and there had been eight rental properties in total with five of them sold which attracted capital gains tax. The ATO had also issued a default assessment for one of those years which was incorrect and needed to be objected to in order to include rental income and correct the classification of a share disposal from foreign income to a sale of shares.

This work couldn't all be done immediately given the need to service other clients, so a staged approach to lodgment was taken. This meant that the ATO automatically applied failure to lodge penalties and general interest charges on top of an increasing primary debt. The reason for the prior year returns outstanding is that the previous accountant had been sitting on them for three years and done nothing.

Situations like this plus responding to notices for outstanding returns affect Lodgment Program performance benchmarks as prioritising outstanding compliance obligations is not taken into account and the performance metric falls below 85 per cent.

***31 March tax return date***

Our practice lodges approximately 2,000 tax returns per annum and our major concern is in regard to the lodgments required on 31 March annually. Our lodgment program annually requires the return lodgments for more than 100 taxpayers that fall within this category and puts great pressure on the annual lodgment program.

Most of these taxpayers, if not all, pay quarterly PAYG instalments during the course of the year and therefore the Australian Taxation Office (ATO) is not hindered in its collection of taxation process. We therefore cannot see any necessity in respect of collection of taxation liabilities as to why the earlier lodgment date of 31 March is required as opposed to the standard lodgment date of 15 May.

As you will appreciate, when attending to a group of entities on behalf of our client, we are required to complete the whole group of entities to calculate each taxpayer's liability. Therefore, although only one or two entities in a group are required to be lodged by 31 March, we are required to attend to the whole group by that date in order to correctly calculate the tax liability of those taxpayers to meet the earlier lodgment date.

It should also be noted that often the tax liability in excess of \$20,000 is triggered as a result of a one-off capital gain such as the sale of properties, etc. The ATO is fully aware of the nature of these capital gains due to the information provided in the tax returns. These capital gains are usually one-off in nature and do not repeat themselves in subsequent financial years. Therefore, the requirement to lodge by 31 March due to abnormal income in the prior tax year again appears unnecessary.

It would be of significant assistance to tax agents if the 31 March lodgment deadline was abolished and all entities previously required to lodge by that date are instead given the standard lodgment deadline of 15 May.

***Constantly busy Lodgment Program***

Our practice currently lodges 30 monthly activity statements, 170 quarterly activity statements and 900 tax returns. Our clients include large business taxpayers, many small and medium business taxpayers and salary and wage taxpayers. All of these taxpayers have varying degrees of bookkeeping skills and tax knowledge, some employing their own senior bookkeepers while many of them are mum and dad businesses with very little bookkeeping/data entry experience.

The remoteness of some clients can also mean they have limited access to consistent and reliable technology, delayed mail service and limited opportunities to employ someone to help them with their bookkeeping obligations. Many small business clients have a low business profit and this does not allow them to employ bookkeeping staff on a regular basis, even if they could find the staff to employ.

The small and medium taxpayers we work with need us to be involved in almost all their ATO reporting requirements. This includes the IAS, BAS, payroll, STP, superannuation, annual wages reconciliation, payroll tax and ASIC obligations and that's before we even start work on their tax returns.

The rolling due dates across the year make it almost impossible to take any time off work. We also spend time dealing with administrative inefficiencies such as lodgment lists that don't properly distinguish client attributes (e.g., clients who we act for but who do their own BAS and IAS), ATO communications with only a first name so it's unclear who the taxpayer is, redacting private information from ATO communications when sending to clients (e.g., embedded TFNs in payment slips) and misdirected communications when myGov/OSfA settings are changed but clients don't realise what they've done.

## Additional issues

- The ATO is increasingly visible and present in the daily operations of tax practitioners through digital communications and notifications. This results in tax practitioners having to constantly react to ATO communications, demand notices and compliance enquiries, rather than proactively managing their work program with the knowledge that the ATO trusts that the necessary actions will be taken. For those engaged in reviews, audits or objections, ATO staff expect immediate responses and do not accommodate the tax practitioner's overall practice and their need to service their client base, not just those being checked by the ATO.
- The service provided and responsiveness to tax practitioner requests is not timely. Issues and queries that used to be resolved in days, is now taking weeks. Often a complaint must be put in for action to be taken.
- We need support and responsiveness from the ATO to ensure that we can lodge clients' returns on time. I contacted the ATO's technical section in the second week of December 2021 regarding difficulties lodging a particular company tax return and was given a 28-day response time and told to call back on 12 January 2022. We are expected to ensure compliance and correct lodgments but when we ask for assistance, it is not available in the timeframes we need. The ATO expects us to deliver but does not act the same way to us.
- As an accountant, we not only have compliance issues to deal with, but we also must assist our clients with their businesses. So many clients have been affected by these lockdowns and we, as accountants, are trying our best to help these clients survive. We work long hours, and it is affecting our mental health as there is lack of support from the ATO. One thing the ATO does not understand is that we do not just do compliance work. If our work only consisted of compliance work, then we would all be on time with our lodgments every year. For example, the recent COVID lockdowns in Sydney created a lot of issues for us due to Service NSW placing responsibility on us to provide letters so that clients were paid the grants. This caused additional pressure as we were required to help clients and to keep up with Business Activity Statements, Tax Returns, Super, STP Reporting and TPARS etc.
- On top of the lodgment pressures, we also must comply with the requirements of other government and private sector entities. For example, banks are now asking for 2021 financials by the 31st January with only ten days' notice. These unplanned and unreasonable deadlines on top of all the pressures imposed by government make our jobs impossible.
- The ATO displays the lodgment performance percentage. However, if you click on "more", it does not have a breakdown or list of late tax returns where we can see which clients that the ATO are telling us we have lodged late. Why is there no list for us reconcile late lodgments to?
- If we want to lodge an email with an extension for one client, why do we have to complete a spreadsheet for the email to be submitted. Why can't we just lodge one email with no attachments? Why do we have to lodge an email?
- While the performance metric might work well for the ATO, we find that the statistics aren't measured correctly.

## Suggested solutions

- Why not keep it simple? 90 days for quarterly BAS, 12 months for annual returns, etc.
- There is significant time lost to administrative work each year when we go through applying for agent assessed extensions for quarterly BAS lodgments and working out which clients are or are not eligible for 5th June income tax return extensions. However, we believe the entire lodgment program could be streamlined if they removed the assessed agent extensions and replaced them with more generous concessional due dates for BAS lodgments. This change would be beneficial as more clients rely on our day-to-day bookkeeping and payroll services. The same streamlined approach could be taken for the 15th May due date by extending the concession to the 5th June for most of our clients. The due date for payment can remain the 5th June.
- One suggestion is that only chronic late lodgers should lose concessional treatment. Alternatively, they should only lose the concessional date if they have outstanding obligations from prior years. Once all the obligations have been brought up to date, they receive their concessional date back.
- If we have requested a supported lodgment program from the ATO, when our program is about to expire someone should be contacting us to see if we do need additional support or time to lodge. At the moment, we are required to lodge additional requests if we need more help. The ATO should be allocating case managers that call us to see if everything is ok or if we need more help.
- When under a supported lodgment program, an indicator should be placed on file that overrides automated processes (e.g., lodgment demand notices) that is visible to ATO staff (e.g., debt collection call centres). The points of contact for all lodgment-related issues should revert to the Supported Lodgment Program teams who should ensure that processes and systems in other areas do not unduly affect practitioners in the program.

- There should also be an easier way for us to request additional time to lodge on the portal for each client instead of having to wait 28 days for approvals to be issued and in the meantime be bombarded with mail stating returns are overdue.
- In terms of practice efficiency, the automatic logout on ATO/MyGov after 20 minutes is frustrating and time-consuming. This should be extended to a reasonable period of time in a day. I wonder how many thousand tax agent hours have been wasted so far doing these two or three times a day extra?
- We have said for years that it would be a far superior system, with less errors likely to occur, if the lodgment program for individual returns was not opened until the beginning of September by the ATO. We are aware of some firms who simply do not accept any tax return appointments until then, but this is an unrealistic idea in a competitive market. We fear losing clients to other firms who have greater resources for that period and so we haven't taken this step. Moving the start date for processing of individual returns would allow more accurate information to be finalised in the July and August period, thus reducing amendments later on during the year.