



Response to the IASB Exposure Draft
Annual Improvements to IFRSs
2011-2013 Cycle

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INTRODUCTION

ICAS welcomes the opportunity to comment on the IASB's Exposure Draft: Annual Improvements to IFRSs 2011-2013 Cycle.

The ICAS Charter requires its committees to act primarily in the public interest, and our responses to consultations are therefore intended to place the public interest first. Our Charter also requires us to represent our members' views and to protect their interests, but in the rare cases where these are at odds with the public interest, it is the public interest which must be paramount.

The ICAS Accounting Standards Committee has considered the Exposure Draft and I am pleased to forward their comments.

Any enquiries should be addressed to Ann Buttery, Assistant Director, Technical Policy and Secretary to the Accounting Standards Committee.

RESPONSE TO THE EXPOSURE DRAFT

In general, we are in agreement with the proposals outlined in the Exposure Draft.

However, we are concerned with the IASB's amendments to the Basis for Conclusions of standards. Specifically, we refer to page nine of this Exposure Draft where the IASB proposes to amend the Basis for Conclusion on IFRS 1, 'First time adoption of International Financial Reporting Standards'.

We believe this amendment represents a clarification of the required accounting and therefore should be part of the standard itself. Further, we note that as Bases for Conclusions to IFRS do not form part of EU endorsed standards, any changes to Basis for Conclusions would not be available for use by EU preparers, and also, are not readily accessible without undue cost.

For each IFRS, the Basis for Conclusions is developed at the time the standard is first issued, reflecting the Board's thinking at that time, and should not be amended. Any points that need to be updated because of subsequent developments should be clearly annotated by footnotes.