

Exposure Draft ED/2011/2,
Improvements to IFRSs

response to exposure draft

18 October 2011

CIPFA, the Chartered Institute of Public Finance and Accountancy, is the professional body for people in public finance. Our 14,000 members work throughout the public services, in national audit agencies, in major accountancy firms, and in other bodies where public money needs to be effectively and efficiently managed.

As the world's only professional accountancy body to specialise in public services, CIPFA's portfolio of qualifications are the foundation for a career in public finance. They include the benchmark professional qualification for public sector accountants as well as a postgraduate diploma for people already working in leadership positions. They are taught by our in-house CIPFA Education and Training Centre as well as other places of learning around the world.

We also champion high performance in public services, translating our experience and insight into clear advice and practical services. They include information and guidance, courses and conferences, property and asset management solutions, consultancy and interim people for a range of public sector clients.

Globally, CIPFA shows the way in public finance by standing up for sound public financial management and good governance. We work with donors, partner governments, accountancy bodies and the public sector around the world to advance public finance and support better public services.

Our ref: Responses/111018 SC0170

International Accounting Standards Board
30 Cannon Street
London EC4M 6XH

Submitted electronically to www.ifrs.org

Dear IASB secretariat

Exposure Draft ED/2011/2, Improvements to IFRSs

CIPFA is pleased to present its comments on this Exposure Draft, which have been reviewed by CIPFA's Accounting and Auditing Standards Panel.

CIPFA's comments on the general questions in the Invitation to Comment are as follows:

Question 1

Do you agree with the Board's proposal to amend the IFRS as described in the exposure draft? If not, why and what alternative do you propose?

Repeated application of IFRS 1

CIPFA agrees with the proposal relating to repeated application. However, in our view it would be appropriate for an entity that has previously applied IFRS 1 to disclose the fact that they are re-adopting IFRS, and to explain

- The reason for ceasing reporting under IFRS and
- The reason for re-adoption.

IFRS 1 re Borrowing costs

IAS 1 Clarification of requirements for comparative information:

IAS 1 Changes to reflect the Conceptual Framework for Financial Reporting 2010

IAS 16 Classification of servicing equipment

CIPFA is content with these proposals.

IAS 32 Income tax consequences

IAS 34 Interim financial reporting and segment information for total assets

CIPFA has no comments to make on these proposals.

Question 2

Do you agree with the proposed transitional provisions and effective date for the issue as described in the exposure draft? If not, why and what alternative do you propose?

CIPFA agrees with the proposed transitional provisions and effective date.

I hope this is a helpful contribution to the development of the Board's guidance in this area.

Yours faithfully

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