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INSTITUTO DE CONTABILIDAD
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Exposure Draft ED/2009/11: Improvements to IFRS
Comment Letters
International Accounting Standards Board
30 Cannon Street
London EC4M 6XH
UK

Dear Sir/Madam,

We are pleased to send you ICAC's comments on the IASB's Exposure Draft *Improvements to IFRSs*, in the present letter.

First of all, we would like to highlight that we are of the view that any change to be introduced in a Standard should be argued and justified enough. Costs and benefits of implementing changes in the standards by users, needs to be taken into account.

Nevertheless, we recognise the importance and relevance of some issues, so therefore we will support the IASB on those changes that will solve any possible deficiencies detected in IASB's standards.

In general terms, we find reasonable most of the proposals set in the ED for improving current IFRSs.

At this stage, we set out below our main concerns on some of the amendments proposed:

Amendment to IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors:

We are of the view that it would be more appropriate if the amendments proposed to IAS 8 were introduced within the context of the issuance of a new "Conceptual Framework: objectives and qualitative characteristics".

This is from our point of view, an essential but not necessary amendment at present that arises from the Framework project jointly undertaken by the IASB and FASB, this project is currently underway, through several phases, so therefore we believe that its new terminology and content should be applied when it is finally issued.

Amendment to IAS 27 Consolidated and Separate Financial Statements:

In relation to amendment proposed to paragraph 38 (b) to delete "in accordance with IAS 39" and instead introduce "at fair value through profit or loss" as the other option, alternative to cost, of accounting the entity's investments in subsidiaries, jointly



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controlled entities and associates on its separate financial statements, we believe that the replacement is not equivalent. The amendment will have the effect of narrowing down the accounting choice available under existing IFRS, so our proposal is to maintain the possibility of measuring investments in subsidiaries, jointly controlled entities and associates at fair value through profit or loss or equity.