

24 November 2009



IASB

The Institute of Certified  
Public Accountants in Ireland

17 Harcourt St, Dublin 2, Ireland

**Phone** 01 425 1000

**Fax** 01 425 1001

**Email** [cpa@cpaireland.ie](mailto:cpa@cpaireland.ie)

**Web** [www.cpaireland.ie](http://www.cpaireland.ie)

Chief Executive: Eamonn Siggins

To whom it may concern,

The Institute of Certified Public Accountants in Ireland welcomes the opportunity to comment on:

**‘Improvements to IFRSs’**

In response to specific questions asked, we would like to make the following comments:

**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?**

We agree with the proposed amendments.

**Question 2**

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

We agree with the proposed amendments.

**Question 3**

**The Board proposes changes to IAS 34 Interim Financial Reporting to emphasise its disclosure principles. It also adds to the guidance to illustrate better how to apply these principles. The Board published an exposure draft Fair Value Measurement in May 2009. In that exposure draft, the Board proposes that all of the fair value measurement disclosures required in IFRS 7 Financial Instruments: Disclosures for annual financial statements should also be required for interim financial statements.**

**Do you agree that this proposed amendment is likely to lead to more useful information being made available to investors and other users of interim financial reports? If not, why? What would you propose instead and why?**

It has been well flagged that the disclosure requirements for Financial Instruments (along with the Pillar III requirements of Basel II/EU Capital Requirements Directive) are onerous. However, we believe that they are vital to the understanding of financial statements for all users. Especially given today's environment of tight liquidity and lack of access to financial markets/credit, we agree with the proposed amendment whereby full information on financial instruments would also be disclosed in interim financial statements.

#### **Question 4**

**The Board proposes changes to IAS 34 Interim Financial Reporting. Do you agree that amending IAS 34 to require particular disclosures to be made in interim financial statements is a more effective way of ensuring that users of interim financial statements are provided with useful information? If not, why? What approach would you propose instead and why?**

We agree that amending IAS 34 to require particular disclosures to be made in interim financial statements is an effective way of ensuring the users of interim financial statements are provided with useful information.

#### **Question 5**

**The Board proposes to amend IAS 40 Investment Property to remove the requirement to transfer investment property carried at fair value to inventory when it will be developed for sale, to add a requirement for investment property held for sale to be displayed as a separate category in the statement of financial position and to require disclosures consistent with IFRS 5 Non-current Assets Held for Sale and Discontinued Operations. Do you agree that the proposed amendment should be included within Improvements to IFRSs or should a separate project be undertaken to address this issue? If you believe a separate project should be undertaken, please explain why.**

Agree with the amendments to IAS 40 as they provide a more consistent approach comparable to IFRS 5. Agree with the amendments being included within 'Improvements to IFRSs' however we suggest, in the interests of simplification, that IAS's and IFRS's are combined into one set of standards.

The Institute of Certified Public Accountants in Ireland hopes that these comments are beneficial to you and we would be happy to discuss any of the above with you.

Yours sincerely,

Declan Nestor  
Chairperson, Financial Reporting Sub - Committee

