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Submitted by email to [improvementscriteria@ifrs.org](mailto:improvementscriteria@ifrs.org)

**Exposure Draft: Proposed Amendments to Due Process Handbook for the IASB**

Grant Thornton International Ltd is pleased to comment on the Exposure Draft of *The annual improvements process: Proposals to amend the Due Process Handbook for the IASB* issued by the Trustees of the IFRS Foundation.

We agree that amendments made through the annual improvements process should be restricted to those that clarify IFRS and/or correct relatively minor unintended consequences, conflicts or oversights. As some of the corrective amendments may create exceptions from existing principles, we agree that clear criteria are needed to identify which issues can be appropriately dealt with through the annual improvements process.

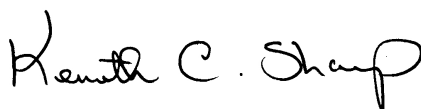
We also agree with the proposed criteria. The need for the consequences of the proposed change to be considered sufficiently, and the probability that a timely conclusion can be reached (paragraphs 65A(b) and (c)), are particularly important. This should ensure that a corrective amendment does not have wider, unintended consequences.

A useful additional criterion for proposed amendments is the expectation of diversity of interpretation in practice, which is one of the criteria used by the IFRS Interpretations Committee (IFRIC) to set their agenda. A link between the criteria for the annual improvements and for the IFRIC agenda would be useful to provide added clarity as to which route an issue should best follow for resolution.

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If you have any questions on our response, or wish us to amplify our comments, please contact our Executive Director of International Financial Reporting, Andrew Watchman ([andrew.watchman@uk.gt.com](mailto:andrew.watchman@uk.gt.com) or telephone + 44 207 391 9510).

Yours sincerely,



Kenneth C Sharp  
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