

International Accounting Standards Board
30 Cannon Street
London EC4M 6XH
United Kingdom
www.ifrs.org

Chris Barnard
Germany

14 December 2012

- Your Ref: Comment letter on IASB Proposal to Establish an Accounting Standards Advisory Forum

Dear Sir.

Thank you for giving us the opportunity to comment on your Proposal to Establish an Accounting Standards Advisory Forum.

The International Accounting Standards Board (IASB) currently engages with national standards setters (NSS) and other regional bodies through a range of bilateral and ad hoc arrangements. Given the increasing use of IFRSs around the world, the IASB wants to formalise these relationships and engage with NSS and other regional bodies on a collective basis. The IASB therefore proposes to establish a new advisory group of NSS and regional bodies that should: support the IFRS Foundation's mission to develop, in the public interest, a single set of high quality, understandable, enforceable and globally accepted financial reporting standards; provide input on technical issues; support consistent application of IFRSs by jurisdiction and in the region; and making their best efforts to promote the endorsement/adoption of IFRSs in full and without modification over time.

I support this development, as it will achieve a more streamlined, transparent and collective relationship through dealing with a single counterparty rather than the series of ad hoc bilateral relationships that have been developed piecemeal over time. I fully agree that there is a risk that this forum could compromise the independence of the IASB, but as long as this issue is thoroughly addressed through a clear commitment to independence,¹ transparency and openness, then this development will improve the standard-setting process and the acceptance and consistent implementation of standards globally.

¹ In particular, the formal mechanism should be advisory only.

Answers to specific questions raised by the IASB

Question 1:

Do you agree with the proposed commitments to be made by ASAF members (paragraph 6.4) and that they should be formalised in a Memorandum of Understanding (paragraph 6.5)? Why or why not?

Yes, I agree with the proposed commitments to be made by ASAF members. I also support that they should be formalised in a Memorandum of Understanding, as this will improve accountability and transparency in the commitment process.

Question 2:

The Foundation believes that, in order to be effective, the ASAF needs to be compact in size, but large enough to allow for an appropriate global representation. Do you agree with the proposed size and composition as set out in paragraphs 6.7–6.13? Why or why not?

Yes, I agree with the proposed size and composition of the ASAF.

Yours faithfully

C.R. Barnard

Chris Barnard