



Ms Francoise Flores,
EFRAG,
35 Square de Meeus,
B-1000 Brussels,
Belgium

By e-mail

Ref: TECH-CDR-1216

27 June 2013

Dear Ms Flores,

PRUDENCE

Bulletin in the series ‘Getting a Better Framework’ , issued by the European Financial Reporting Group (EFRAG) and the national standard-setters of France, Germany, Italy and the United Kingdom

ACCA is pleased to comment on this Bulletin, as below. We support critical thought on concepts whose inclusion or exclusion from the Conceptual Framework has an impact on the foundation for the preparation of financial statements. ACCA’ s Global Forum for Corporate Reporting has considered this Bulletin, and its views are reflected in the following comments.

General Comments

ACCA will express its views on this topic as part of its response to the forthcoming consultation by the International Accounting Standards Board (IASB) on the Conceptual Framework. We believe that it will be most helpful for all views relating to the Conceptual Framework to be provided in the responses to one consultation.

Whilst the IASB is not planning to seek views again on the section of the Framework dealing with the qualitative characteristics of useful financial information, we will provide comments related to these characteristics where they supplement our responses to the IASB' s consultation questions.

For example, considerations of prudence may be applicable for ACCA' s responses to the IASB' s questions on measurement and disclosure. In so doing, we may well also develop the ideas in this Bulletin on prudence, such as any contrast with the idea of neutrality, and whether prudence is best reflected within individual Financial Reporting Standards, rather than the Conceptual Framework itself.

If there are any matters arising from the above on which you would like further clarification, please let me know.

Yours sincerely



Paul Cooper
corporate reporting manager

Paul.Cooper@accaglobal.com