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INSTITUTO DE CONTABILIDAD
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Coment letter on IASB and IFRS Interpretations Committee Due Process Handbook

Comment Letters
European Financial Reporting Advisory Group
35 Square de Meeûs
Brussels B-1000
Belgium

Dear Madam/Sir,

In the present letter ICAC gives its view on some specific issues raised on IASB and IFRS Interpretations Committee Due Process Handbook

First of all, we would like to highlight the important efforts that the IFRS Foundation and its Due Process Oversight Committee have made to improve the due process of the IASB and the IFRS Interpretations Committee.

In general terms ICAC agrees with most of the proposals, and in particular with the EFRAG comments about the proposal, although we would like to draw the attention to the following issues:

We believe that transparency and a proper oversight in the standard setting process are always essential and all the efforts made in that direction are welcome. Nevertheless, we believe that the oversight process should be deeper including substance and not only formal aspects.

In order to achieve as a goal the international harmonization in the financial reporting field, we consider crucial that the IASB should be provided with a due process handbook enables to guarantee high quality, but also once standards have been endorsed, they should be long-standing, as a result of such high standards.

IASB should bear in mind that in the majority of countries or jurisdictions in the European Union, IFRS are only required to formulate consolidated financial statements. Nevertheless, some Member States have decided to modify their accounting standards in order to harmonize them with the IFRS. Other Member States could be considering adapting or adopting IFRS. Such decision implies in the majority of cases that because accounting standards have to be entailed with other law disciplines (for instance, commercial law, tax law) in order to take accounting amounts as a reference, constant amendments in the context of accounting standards are damaging legal security that companies need to take economics decisions.



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In addition, we are of the view that national and regional accounting standards bodies should have a more relevant role so their opinions about the relevance of the draft amendments and about technical solutions proposed need to be lent a proportional weight to the ones granted to the companies that have to apply IFRS.

Please don't hesitate to contact us if you would like to clarify any point of this letter.

Ana M^a Martínez-Pina
Chairman of ICAC

Madrid, 6th. September 2012