



Response to the EFRAG and National Standard Setters of France, Germany, Italy and the UK “Getting a Better Framework” Bulletins: Prudence, Reliability of Financial Information and Uncertainty

5 JULY 2013

INTRODUCTION

ICAS welcomes the opportunity to comment on the EFRAG and National Standard Setters of France, Germany, Italy and the UK “Getting a Better Framework” Bulletins: Prudence, Reliability of Financial Information and Uncertainty.

The ICAS Charter requires its committees to act primarily in the public interest, and our responses to consultations are therefore intended to place the public interest first. Our Charter also requires us to represent our members’ views and to protect their interests, but in the rare cases where these are at odds with the public interest, it is the public interest which must be paramount.

The ICAS Accounting Standards Committee has considered the Bulletins and I am pleased to forward their comments.

Any enquiries should be addressed to Ann Butterly, Assistant Director, Technical Policy and Secretary to the Accounting Standards Committee.

RESPONSE TO THE BULLETINS

We acknowledge that these are very important topics as it has not been properly articulated by the IASB how these fundamental concepts apply to the financial statements. We also recognise that it is important to be explicit in our understanding of these key concepts when standard setting.

However, we believe that one cannot look at each concept in isolation, that is, in order to reach an appropriate conclusion regarding the concepts, one should understand the context by considering all of the concepts as a complete package. As such, we believe that informed judgements can only be made once the documents in relation to the other parts of the Conceptual Framework have been published.