



27 October 2010

Our ref: ICAEW Rep 114/10

Your ref: ED/2010/10

Mme Françoise Flores
Chair
European Financial Reporting Advisory Group
13-14 Avenue des Arts
B-1210 Brussels

By email: commentletter@efrag.org

Chère Mme Flores

Removal of Fixed Dates for First-time Adopters: proposed amendments to IFRS 1

The ICAEW is pleased to respond to your request for comments on the IASB Exposure Draft *Removal of Fixed Dates for First-time Adopters: Proposed Amendments to IFRS 1*.

The ICAEW operates under a Royal Charter, working in the public interest. Its regulation of its members, in particular its responsibilities in respect of auditors, is overseen by the Financial Reporting Council. As a world leading professional accountancy body, we provide leadership and practical support to over 134,000 members in more than 160 countries, working with governments, regulators and industry in order to ensure the highest standards are maintained. We are a founding member of the Global Accounting Alliance with over 775,000 members worldwide.

We agree with EFRAG's assessment to support the IASB's proposals to replace references in the appendix to IFRS 1 to the '1 January 2004' and '25 October 2002' with 'the date of transition to IFRS'. As time passes the fixed transition date of 1 January 2004 becomes more remote and we believe that revision is now due. Dates of transition are jurisdiction specific and therefore we support the removal from the standard of a fixed date. We believe that the costs of reconstructing transactions back to 1 January 2004 are likely to exceed the benefits of doing so.

We do however, question why this minor change has been the made the subject of a separate Exposure Draft when it would have been more efficient to combine it with other adjustments of a similar type in the annual improvements project.

Please contact me should you wish to discuss any of the points raised in this response.

Yours sincerely

John Boulton ACA
Technical Manager, Financial Reporting Faculty

T +44 (0)20 7920 8642
E john.boulton@icaew.com

The Institute of Chartered Accountants in England and Wales
Chartered Accountants' Hall
Moorgate Place London EC2R 6EA UK
icaew.com

T +44 (0)20 7920 8100
F +44 (0)20 7920 0547
DX 877 London/City