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Dear Sir or Madam

### **Getting a Better Framework Complexity Bulletin**

We welcome the opportunity to comment on the 'Getting a Better Framework Complexity Bulletin' ("the Bulletin").

We agree with the suggested discussion of complexity within 'understandability' and 'the cost constraint' in the Conceptual Framework.

We also concur with the views that:

- the length and detail contained in some accounting standards adds unnecessary complexity and can make it difficult to identify the principles; and
- the number of amendments and annual improvements to accounting standards make them more difficult to apply.

Whilst we have no further comments on aspects of complexity in accounting standards not covered by the Bulletin, we would note that many of the complexities within the hedging requirements of IAS 39 have been addressed in IFRS 9.

In addition, as set out in our responses to the FRC's Discussion Paper: 'Thinking About Disclosures in a Broader Context', the FRC's Report 'Cutting Clutter. Combating clutter in the annual accounts' and the joint EFRAG, ANC and FRC Discussion Paper: 'Towards a Disclosure Framework for the Notes', we consider that disclosures within financial statements could be improved by reducing the volume of information, and improving the presentation of information.

Extensive disclosures that contain 'boiler plate' wording add unnecessary complexity which could be reduced by principles-based disclosures aimed at making information in the notes to the financial statements specific, necessary and relevant to users of those financial statements.

If you would like to discuss any aspect of this response please do not hesitate to contact me.

Yours faithfully

**Donna Wilcox**  
**Technical Senior Manager**  
**Baker Tilly UK Audit LLP**