



The Group of 100 Incorporated

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Mr H. Hoogervorst
Chairman
International Accounting Standards Board
30 Cannon Street
London EC 4M 6XH
UNITED KINGDOM

commentletters@ifrs.org

Dear Mr Hoogervorst

ED/2015/4 "Updating references to the Conceptual Framework"

The Group of 100 (G100) is an organization of chief financial officers from Australia's largest business enterprises with the purpose of advancing Australia's financial competitiveness. The G100 is pleased to provide comment on this ED.

Q1. Replacing references to the Conceptual Framework

The IASB proposes to amend IFRS 2, IFRS 3, IFRS 4, IFRS 6, IAS 1, IAS 8, IAS 34, SIC-27 and SIC-32 so that they will refer to the revised Conceptual Framework once it becomes effective. Do you agree with the proposed amendments? Why or why not?

The G100 supports the proposals as it would be incongruous for references in individual standards to be inconsistent with an updated conceptual framework. As such, the additional amendments are necessary and desirable. However, where there is the potential for a cross-reference to affect current practice those changes should be subject to a separate due process once the changes to the conceptual framework are decided.

Q2. Effective date and transition

The IASB proposes that:

- a. a transition period of approximately 18 months should be set for the proposed amendments. Early application should be permitted.*
- b. The amendments should be applied retrospectively in accordance with IAS 8, except for the amendments to IFRS 3. Entities should apply the amendments to IFRS 3 prospectively, thereby avoiding the need to restate previous business combinations.*

Do you agree with the proposed transition provisions and effective date? Why or why not?

The G100 agrees that there should be a transition period where a change in accounting policies occurs as a result of the changes. However, we suggest that approximately 18 months is an unusual transition period and suggest that entities should be given a maximum of 2 financial years to make the transition with the option of early adoption.

The G100 supports the transition relief in respect of amendments to IFRS 3.

The G100 does have a broader concern that updating cross references may lead to changes in accounting policies. If the IASB believes this to be the case those changes should be subject to a separate due process once the conceptual framework is finalised.

Q3. Other comments

Do you have any other comments on the proposals?

The G100 has no further comments.

Yours sincerely
Group of 100 Inc



Neville Mitchell
President

