7 December 2015

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

commentletters@ifrs.org

Dear Mr Hoogervorst

<p style="text-align:center">**Agenda Consultation 2015 – Request for Views**</p>

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 respond to the request for views.

The balance of the IASB's projects
Q1   The IASB's work plan includes five main areas of technical projects:
a. *its research program;*
b. *its Standards-level program;*
c. *the Conceptual Framework;*
d. *the Disclosure Initiative; and*
e. *maintenance and implementation projects.*

What factors should the IASB consider in deciding how much of its resources should be allocated to each area listed above?
The principal factors the IASB should consider are the actions that are necessary to ensure the preparation of a suite of high quality financial reporting standards that meet the needs of users and are capable of cost-effective implementation. This reduces to identifying the projects where the most benefit will result. In this regard it is important to complete the conceptual framework as a matter of priority and to advance work on the Disclosure Initiative.

Research projects
Q2   The IASB's research program is laid out in para 32 and a further potential research topic on IFRS 5 is noted in para 33. Should the IASB:
a. *add any further projects to its research program? Which project, and why? Please also explain which current research projects should be given a lower priority to create the capacity for the IASB to make progress on the project(s) that you suggested adding.*
b. *Remove from its research program the projects on foreign currency translation (see paras 39-41) and high inflation (see paras 42-43)? Why or why not?*
c. *Remove any other projects from its research program?*

a. The G100 does not consider that any further items should be added to the research program. However, there should be sufficient flexibility in the plans to facilitate the addition of projects, if any, resulting from the implementation of standards, for example, revenue, leases and insurance contracts.
b. The G100 agrees with removing foreign currency translation and high inflation from the research program. However, we consider that the extractive industries, intangible assets project warrants further consideration.
c. No.

Q3   *For each project on the research program, including any new projects suggested by you in response to Q2, please indicate its relative importance (high/medium/low) and urgency (high/medium/low). Please also describe the factors that led you to assign those rankings, particularly for those items you ranked as high or low.*

Assessment stage:

Project	Priority
Definition of a business	Medium
Discount rates	High
Goodwill and impairment	High
Income taxes	High
Pollutant pricing mechanisms	Low
Post-employment benefits	Low
Primary financial statements	High
Provisions, contingent liabilities, contingent assets	Medium
Share-based payment	Medium

Development Stage:

Project	Priority
Business combinations under common control	Medium
Disclosure initiative – principles	High
Dynamic risk management	Low
Equity method	Low
Financial instruments with characteristics of equity	Low

Inactive

Project	Priority
Extractive activities	Low
Foreign currency translation	Remove
High inflation	Remove

These ratings are based on our assessment as to where the needs of users can be best met by improvements in financial reports. For example, the discount rate issue is pervasive and underlies the approach in many standards, dealing with primary financial statements offers the opportunity to consider how to deal with providing more flexibility in the presentation of information including digital reporting, the treatment of goodwill and impairment is a major concern and dealing with income taxes may also involve consideration of issues relating to the transparency.

The existing program is sufficiently broad without adding further projects. We suggest that if projects are to be added it is necessary to remove or classify some projects as inactive.

Major projects
Q4   Do you have any comments on the IASB's current work plan for major projects?
The G100 considers the Disclosure Initiative projects are high priority projects, particularly the development of principles fo disclosure and how they are reflected in the standards.

Maintenance and implementation projects
Q5   Are the IASB and the Interpretations Committee providing the right mix of implementation support to meet stakeholders' needs and is that support sufficient (see paras 19-23 and 50-52?)
Our concern with the approach to maintenance and implementation projects is the length of time between identifying a problem/issue and its resolution. We suggest that the IASB spend more time and resources to seek feedback and respond to implementation issues before determining the application date of a standard and in so doing avoid deferral of the application date and the issue of an exposure draft to resolve issues and clarify requirements.

Level of change
Q6   Does the IASB's work plan as a whole deliver change at the right pace and at a level of detail that is appropriate to principle-based standard-setting? Why or why not?
The G100 considers the current IASB work plan is appropriate in view of its resources and the ability of constituents to participate in its due process.

Any other comments
Q7   Do you have any other comments on the IASB's work plan?
No.

Frequency of Agenda Consultations
Q8   Because of the time needed to complete individual major projects, the IASB proposes that a five year interval between Agenda Consultations is more appropriate that the three year interval currently required. Do you agree? Why or why not? If not, what interval do you suggest? Why?
The G100 agrees that the agenda consultation should occur every five years. Apart from the reasons given it also brings it into line with undertaking the strategy and effectiveness review on a five-yearly basis.

Yours sincerely
Group of 100 Inc

Neville Mitchell
President