

15 September 2016

IFRS Foundation
30 Cannon Street
London EC4M 6XH
United Kingdom

**Comment on Exposure Draft – Trustees’ Review of Structure and Effectiveness:
Proposed Amendments to the IFRS Foundation Constitution**

1. The Accounting Standards Board of Japan (the “ASBJ”) welcomes the opportunity to provide comments on the IFRS Foundation’s Exposure Draft *Trustees’ Review of Structure and Effectiveness: Proposed Amendments to the IFRS Foundation Constitution* (the “ED”).
2. Our comments on the ED are as follows:
 - (a) As we noted in our comment letter to the IFRS Foundation's Request for Views *Trustees’ Review of Structure and Effectiveness: Issues for the Review* issued in July 2015, we believe that the Trustees’ Review should be conducted at least every five years and that we do not support proposals that effectively extend this interval (for example, to six or seven years).
 - (b) Although we do not think that people with experience as market and/or financial regulators should be prohibited from becoming members of the IASB, we are not convinced with the proposal that there must be at least one member of the IASB with such background. We do not think the rationale for requiring at least one member of the IASB with experience as a market and/or financial regulator is clear.
 - (c) The IFRS Advisory Council is the official advisory body to the IASB and the Trustees of the IFRS Foundation and we believe it is an important organisation for the governance of developing IFRS standards. Accordingly, if the number of meetings were to be reduced from three times a year to two times a year, there needs to be compelling reasons for such change but we do not think such reasons have been provided. If this change were to be finalised, we think the

Trustees should clearly state the reasons for the change. Furthermore, our understanding is that “at least two times a year” does not preclude the IFRS Advisory Council from holding three or more meetings a year. We propose that the IFRS Advisory Council meeting be held twice in 2017 experimentally, and based on the feedback, decide whether to continue to hold the meeting twice a year or revert to three times a year.

3. We hope our comments are helpful for consideration by the IFRS Foundation. If you have any questions, please feel free to contact us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Yukio Ono', with a stylized flourish at the end.

Yukio Ono

Chair

Accounting Standards Board of Japan