

Accounting Standards Board of Japan (ASBJ)

Fukoku Seimei Building 20F, 2-2, Uchisaiwaicho 2-chome, Chiyoda-ku, Tokyo 100-0011, Japan
Phone +81-3-5510-2737 Facsimile +81-3-5510-2717 URL <http://www.asb.or.jp/>



31 January, 2011

The Trustees of IFRS Foundation
30 Cannon Street
London EC4M 6XH
United Kingdom

Dear Trustees

Re: IFRS Interpretation Committee Review

The Accounting Standards Board of Japan (ASBJ) appreciates the opportunity to respond to the questions regarding the IFRS Interpretation Committee (the Committee), which were asked by the Due-Process Oversight Committee of the Trustees.

As well known already, there have been heightened interest in the IFRSs and its interpretation in Japan, since Business Accounting Council, the advisory body to the Commissioner of the Financial Services Agency (FSA), published the opinion report that recommend the voluntary application of IFRSs and decision of its mandatory application around 2012. Since publication, FSA has taken steps to permit the voluntary use of IFRSs, and a number of companies have been busy with transitional exercise aiming to apply IFRS in the near future. During the process, myriad of practical issues which may need the interpretive guidance have surfaced.

Our response in the attachment reflects the abovementioned background. While we appreciate the Trustees' consideration regarding every aspect of our response, the gist of our response is as follows:

Structure of the Committee and its meetings

We appreciate that the Committee members work with a professional expertise and dignity, and all meetings are held in a productive manner. Under the current presumption where the Committee consists of volunteer members who try to address all issues stated in the objectives, we think that the operating procedures (e.g., frequency, length) are the reasonable consequence; however, we believe it not optimal in responding to global demand from practice.

Accordingly, we suggest the Trustees and the Committee consider following options.

Option 1: Changing part-time membership into those consists of full-time members

Without preempting the financing constraint, it may be possible to change the current volunteer membership into the full-time membership so that the Committee members

are able to discuss more issues extensively by sparing more time for each topic and increasing the number of meetings per year. This, we believe, will also enable the Committee members to study the issues more in-depth by undertaking outreaching activities around the globe.

Option 2: Utilizing regional activities

We think that interpretation should be based on an in-depth understanding of the underlying transactions, and relevant information is more easily accessible if one resides in the region where transaction actually takes place. Our experience through the corroborative work at the Asian-Oceanian Standard Setters Group (AOSSG) suggests that more work can be done at regional basis, ranging from preliminary examination among the peers before the submission to the Committee to some type of regional interpretation. In so doing, we expect that the satellite office that the Trustees have been deliberating will be the key to its proper functioning.

Likewise, we encourage the Committee to consider utilizing the office to convene its meetings, which will enables effective communication with stakeholders in different regions.

Option 3: Transforming the Committee into separate Task Forces

Whilst we agree that the Committee members possess strong expertise in accounting and profound practical experience, considering the dynamics of the business transactions and complication of accounting standards in the recent years, it is almost impossible to expect someone to possess expertise in all subject matters and accounting techniques. Rather, focusing on specific areas are the ones that one can expect in reality. Therefore, we think it may be appropriate to transform the Committee into separate task forces which address respective areas including *Financial Instruments* and *Insurance*.

In doing so, we think it advisable to consider that the IASB member(s) chair the respective task force(s) according to respective expertise, so that the IFRS Foundation as a whole can make the best use of the extant resource both in terms of effectiveness and efficiency. In addition, it will reinforce the linkage between the IASB and the Committee, which will facilitate the practical consideration by the IASB in its standards setting process.

In our view, the current observer status granted to four IASB members is ambiguous in terms of their responsibility, considering that an oral update by a staff in effect plays a role to ensure the linkage between the Committee and the IASB. We think an appointment of the IASB member(s) to chair the task force(s) will clarify their responsibility, and it may work as a plan-b as well, if full-time membership that we

suggested in the option-1 is not feasible due to the financial constraint of the Foundation. This mechanism, we believe, will also be relevant to the regional activities that we suggested in the option-2.

Agenda criteria

We perceive that the agenda criteria as currently described in the IFRIC Due Process Handbook are too-narrowly defined or understood, so that too many issues have been rejected by the Committee.

In particular, we have observed that the Committee often rejects the issue raised, with the ground that “(a) *The issue is widespread and has practical relevance*” is not met. We wonder if the word “*widespread*” has been too narrowly interpreted than originally intended. In our view, the original intention is to more on the sense that the Committee will not determine an accounting treatment of particular entities that is the responsibility of the entity and its auditor, which we strongly agree. In this vein, even where the issue arises only from a particular jurisdiction, it should be regarded as “*widespread*”, when it is accounted for very differently among entities in the jurisdiction. Therefore, so as to avoid possible misunderstandings, we suggest clarifying the word “*widespread*” or replacing (a) by the words “*The issue is not peculiar to a particular entity and has practical relevance in jurisdiction(s)*”.

In addition, the criteria “(e) *It is probable that the Committee will be able to reach a consensus on the issue on a timely basis*” may need some amendment or be eliminated, as no one can predict such higher possibility without deliberating issues. Alternatively, the Trustees may take another look at the current consensus-based system in the interpretation process, as it may end up in giving one member a veto right, even where providing the guidance is in the public interest.

Further, another criteria “(f) *If the issue relates to a current or planned IASB project, there is a pressing need to provide guidance sooner than would be expected from the IASB’s activities. The Committee will not add an item to its agenda if an IASB project is expected to resolve the issues in a shorter period than the Committee requires to complete its due process.*” may be too restrictive, as it is the natural inclination that the Board and its stakeholders expect to finish its on-going projects in a shorter time period, while in many cases, they are proven to be too optimistic and that more time is needed in order to solve difficult issues.

Stakeholder Communication

National standards setters (NSSs) are understood to be the ones that have the most updated knowledge in accounting standards and operate as “think-tank”, owing to its expertise as well as its frequent communication with stakeholders in respective

jurisdictions. Thus, we strongly encourage the Committee and its staffs to increase interaction with NSSs or the group of NSSs such as the AOSSG, to identify issues and devise the remedies in a timely fashion.

If you have any questions regarding any matters in our submission, please feel free to contact us.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Ikuo Nishikawa". The signature is fluid and cursive, with the first name "Ikuo" and last name "Nishikawa" clearly distinguishable.

Ikuo Nishikawa
Chairman of the ASBJ



IFRS Interpretations Committee Review

Questionnaire to be completed by all external stakeholders interested in the IFRS Interpretations Committee, including IASB Members, IFRS Advisory Council members, External Observers, national standard setters and all other interested parties.

Name Accounting Standards Board of Japan (ASBJ)
(All responses will remain confidential.)

Background:

Please tick () the appropriate box that best describes your background:

- User
- Preparer
- Auditor
- Regulator
- Academic
- Other (please explain) Accounting Standards Setter

Please indicate the geographic region in which you are located by ticking () the appropriate box:

- Asia/Oceania
- Europe
- North America
- Africa
- South America
- International



IFRS Interpretations Committee Review

Purpose: To assist the Trustees of the IFRS Foundation conduct a review of the effectiveness of the IFRS Interpretations Committee as part of its monitoring of the IFRS Foundation. This questionnaire provides for a performance evaluation of the efficiency and effectiveness of the Interpretations Committee in achieving its objectives and to offer suggestions to improve its operations.

The assessment covers the accomplishments of the Committee. It is not an assessment of the performance of individual Committee members.

Process: This questionnaire employs the following rating graduation:

1 = strongly agree; 2 = agree; 3 = agree somewhat, but needs improvement; 4 = strongly disagree

For all items rated as 3 or 4, it is important that each such rating is supported by comments identifying the areas needing improvement and suggested improvements. However, we strongly encourage respondents to provide comments on all aspects of performance. We would also appreciate comment if you are uncertain, do not know the answer to the question, or feel the answer is not applicable.

Responses will be analysed by staff of the IFRS Foundation and a summary will be circulated to the Trustees. The Trustees will issue a final report in the first half of 2011 and this will be sent to all respondents. It will also be placed on the Foundation's website. The Chairman will make a full report to the Interpretations Committee and time will be made available during the relevant Committee meeting for discussion of the results.

Timing: Respondents are asked to complete this form electronically and return it to interpretations-comm@ifrs.org by **31 January 2011**. Individual responses will remain confidential and will not be published.



IFRS Interpretations Committee Review

Objectives and Scope of Activities of the Interpretations Committee

The objectives of the Committee as set out in the Constitution are:

- To interpret the application of IFRSs and provide timely guidance on financial reporting issues not specifically addressed in IFRSs, in the context of the IASB's Framework, and to undertake other tasks at the request of the IASB¹.
- The other tasks include reviewing and making recommendations to the IASB of items for inclusion in the Annual Improvements process, and review of comment letters received and making recommendations on the finalisation of those Annual Improvements.

#	Criteria	Rating				Uncertain / Do not know	Not applicable
		1	2	3	4		
1.	The Committee's stated objectives and scope of activities are appropriate to assist the IFRS Foundation and the IASB in meeting the objective of promoting the use and rigorous application of IFRSs.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	The Committee understands its objectives and how these link with those of the IFRS Foundation and the IASB. This is reflected in the functioning of the Committee.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	The Committee's activities appropriately reflect its objectives	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	The Committee's experience and expertise are being efficiently and fully utilised by the IASB.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments on Objectives and Scope of Activities of the Interpretations Committee

We think the objective of the Committee is appropriate.

Ratings: 1 = strongly agree; 2 = agree; 3 = agree somewhat, but needs improvement; 4 = strongly disagree

¹ Paragraph 43 of the IFRS Foundation's Constitution.



IFRS Interpretations Committee Review

#	Criteria	Rating				Uncertain / Do not know	Not applicable
		1	2	3	4		
Membership							
Committee members are appointed by the Trustees. The members of the Committee are selected so as to represent the best available combination of technical expertise and diversity of international business and market experience in the practical application of IFRSs and analysis of financial statements prepared in accordance with IFRSs.							
5.	The Committee has a sufficiently broad range of collective expertise, experience and geographical balance to ensure its effective and efficient operation. The Committee membership achieves an appropriate balance of backgrounds and experience.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	The size of the Committee is appropriate to achieve diversity of experience and background without being too large.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments on Membership of the Interpretations Committee							
While we agree that the Committee members possess strong expertise in accounting and profound practical experience, considering the dynamics of the business transactions and complication of accounting standards in the recent years, it is almost impossible to expect someone to possess expertise in all subject matters and accounting techniques. Rather, focusing on specific areas are those that one can expect in reality. Therefore, we suggest the Trustees and the Committee to consider changing its extant structure (Please see our detailed comments in the section "Operating Procedures").							
Ratings: 1 = strongly agree; 2 = agree; 3 = agree somewhat, but needs improvement; 4 = strongly disagree							



IFRS Interpretations Committee Review

#	Criteria	Rating				Uncertain / Do not know	Not applicable
		1	2	3	4		
Operating Procedures							
The Committee generally meets six times each year for one and a half days. Meetings are open for public observation (except for administrative matters).							
7.	Committee meetings are efficient and effective in terms of:						
	(a) Frequency.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(b) Length.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(c) Geographical location (London).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(d) Quality of agenda material.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(e) Quantity of agenda material.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(f) Timely provision of agenda materials (observer notes).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	There is high quality participation and interaction in the discussion by Committee Members in reaching consensus	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.	Committee meetings are productive and achieve their full potential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.	The Committee is optimally placed to meet the future demand of stakeholders	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ratings: 1 = strongly agree; 2 = agree; 3 = agree somewhat, but needs improvement; 4 = strongly disagree							

IFRS Interpretations Committee Review

Comments on Operating Procedures of the Interpretations Committee

We appreciate that the Committee members work with a professional expertise and dignity, and all meetings are held in a productive manner. Under the current presumption where the Committee consists of volunteer members who try to address all issues stated in the objectives, we believe the operating procedures (e.g., frequency, length) are the reasonable consequence; however, we believe it not optimal in responding to global demand from practice.

Accordingly, we suggest the Trustees and the Committee consider following options.

Option 1: Changing part-time membership into those consists of full-time members

Without preempting the financing constraint, it may be possible to change the current volunteer membership into the full-time membership so that the Committee members are able to discuss more issues extensively by sparing more time for each topic and increasing the number of meetings per year. This, we believe, will also enable the Committee members to study the issues more in-depth by undertaking outreaching activities around the globe.

Option 2: Utilizing regional activities

We think that interpretation should be based on an in-depth understanding of the underlying transactions, and relevant information is more easily accessible if one resides in the region where transaction actually takes place. Our experience through the corroborative work at the Asian-Oceanian Standard Setters Group (AOSSG) suggests that more work can be done at regional basis, ranging from preliminary examination among the peers before the submission to the Committee to some type of regional interpretation. In so doing, we expect that the satellite office that the Trustees have been deliberating will be the key to its proper functioning.

Likewise, we encourage the Committee to consider utilizing the office to convene its meetings, which will enables effective communication with stakeholders in different regions.

Option 3: Transforming the Committee into separate Task Forces

Whilst we agree that the Committee members possess strong expertise in accounting and profound practical experience, considering the dynamics of the business transactions and complication of accounting standards in the recent years, it is almost impossible to expect someone to possess expertise in all subject matters and accounting techniques. Rather, focusing on specific areas are the ones that one can expect in reality. Therefore, we think it may be appropriate to transform the Committee into separate task forces which address respective areas including Financial Instruments and Insurance.

In doing so, we think it advisable to consider that the IASB member(s) chair the respective task force(s) according to respective expertise, so that the IFRS Foundation as a whole can make the best use of the extant resource both in terms of effectiveness and efficiency. In addition, it will reinforce the linkage between the IASB and the Committee, which will facilitate the practical consideration by the IASB in its standards setting process.

In our view, the current observer status granted to four IASB members is ambiguous in terms of their responsibility, considering that an oral update by a staff in effect plays a role to ensure the linkage between the Committee and the IASB. We think an appointment of the IASB member(s) to chair the task force(s) will clarify their responsibility, and it may work as a plan-b as well, if full-time membership that we suggested in the option-1 is not feasible due to the financial constraint of the Foundation. This mechanism, we believe, will also be relevant to the regional activities that we suggested in the option-2.

IFRS Interpretations Committee Review

#	Criteria	Rating				Uncertain / Do not know	Not applicable
		1	2	3	4		
Ratings: 1 = strongly agree; 2 = agree; 3 = agree somewhat, but needs improvement; 4 = strongly disagree							
Agenda Criteria							
The criteria for the Committee to address an issue by issuing an Interpretation are as follows:							
(a) <i>The issue is widespread and has practical relevance</i>							
(b) <i>The issue indicates that there are significantly divergent interpretations (either emerging or already existing in practice). The Committee will not add an item to its agenda if IFRSs are clear, with the result that divergent interpretations are not expected in practice.</i>							
(c) <i>Financial reporting would be improved through elimination of the diverse reporting methods.</i>							
(d) <i>The issue can be resolved efficiently within the confines of existing IFRSs and the Framework, and the demands of the interpretation process.</i>							
(e) <i>It is probable that the Committee will be able to reach a consensus on the issue on a timely basis.</i>							
(f) <i>If the issue relates to a current or planned IASB project, there is a pressing need to provide guidance sooner than would be expected from the IASB's activities. The Committee will not add an item to its agenda if an IASB project is expected to resolve the issue in a shorter period than the Committee requires to complete its due process.</i>							
11.	The Criteria for the Committee's interpretative agenda are appropriate and adequate.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12.	The Agenda Criteria are applied appropriately and consistently.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IFRS Interpretations Committee Review

Comments on Agenda Criteria

We perceive that the agenda criteria as currently described in the IFRIC Due Process Handbook are too-narrowly defined or understood, so that too many issues have been rejected by the Committee.

In particular, we have observed that the Committee often rejects the issue raised, with the ground that “(a) The issue is widespread and has practical relevance” is not met. We wonder if the word “widespread” has been too narrowly interpreted than originally intended. In our view, the original intention is to more on the sense that the Committee will not determine an accounting treatment of particular entities that is the responsibility of the entity and its auditor, which we strongly agree. In this vein, even where the issue arises only from a particular jurisdiction, it should be regarded as “widespread”, when it is accounted for very differently among entities in the jurisdiction. Therefore, so as to avoid possible misunderstandings, we suggest clarifying the word “widespread” or replacing (a) by the words “The issue is not peculiar to a particular entity and has practical relevance in jurisdiction(s)”.

In addition, the criteria “(e) It is probable that the Committee will be able to reach a consensus on the issue on a timely basis” may need some amendment or be eliminated, as no one can predict such higher possibility without deliberating issues. Alternatively, the Trustees may take another look at the current consensus-based system in the interpretation process, as it may end up in giving one member a veto right, even where providing the guidance is in the public interest.

Further, another criteria“(f) If the issue relates to a current or planned IASB project, there is a pressing need to provide guidance sooner than would be expected from the IASB’s activities. The Committee will not add an item to its agenda if an IASB project is expected to resolve the issues in a shorter period than the Committee requires to complete its due process.” may be too restrictive, as it is the natural inclination that the Board and its stakeholders expect to finish its on-going projects in a shorter time period, while in many cases, they are proven to be too optimistic and that more time is needed in order to solve difficult issues.

Ratings: 1 = strongly agree; 2 = agree; 3 = agree somewhat, but needs improvement; 4 = strongly disagree

Outputs from the Committee

The Committee addresses issues by:

(a) issuing IFRIC interpretations

IFRS Interpretations Committee Review

#	Criteria	Rating				Uncertain / Do not know	Not applicable
		1	2	3	4		
	(b) proposing issues to the IASB for inclusion in Annual Improvements						
	(c) making recommendations for the IASB to address an issue in some other way, for example inclusion in an existing IASB project or consideration in a post-implementation review						
	(d) issuing an agenda decision not to address an issue through one of the above routes. Agenda decisions for issues considered for an Interpretation are published for public comment for 30 days before being finalised.						
13.	The Interpretations issued and Annual Improvements proposed meet the needs of the IASB and the IFRS Foundation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14.	The Interpretations issued are effective (their number, frequency and content) in meeting the needs of constituents	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15.	The Annual Improvements issued are effective (their number, frequency and content) in meeting the needs of constituents	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.	Agenda decisions are issued when the Committee decides not to take an issue onto its agenda. Some of these agenda decisions do not propose any further action. The content of such agenda decisions is appropriate and sufficient when:						
	(a) the Committee believes the Standards provide sufficient guidance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(b) the Committee is unable to reach a consensus	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17.	The consultative due process for agenda decisions is appropriate and sufficient	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Comments on Outputs from the Committee</p> <p>While we understand the rationale, we do not think that the Committee has provided sufficient interpretive guidance responding to the needs from the practice. Our suggestions are outlined in the section "Operating Procedures."</p>							



IFRS Interpretations Committee Review

#	Criteria	Rating				Uncertain / Do not know	Not applicable
		1	2	3	4		
Ratings: 1 = strongly agree; 2 = agree; 3 = agree somewhat, but needs improvement; 4 = strongly disagree							
Communications							
18.	The Committee's communications are optimal and effective (IFRIC Update and post-meeting podcast)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19.	When appropriate, the Committee and/or the Committee staff liaises effectively with other similar interpretations bodies and National Standard Setters.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20.	The Committee's activities are sufficiently transparent to stakeholders.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments on Communications							
<p>We appreciate the timely update of the Committees' activities via IFRIC updates and post-meeting podcast. This is the significant achievement over the recent years.</p> <p>Nevertheless, national standards setters (NSSs) are understood to be the ones that have the most updated knowledge in accounting standards and operate as "think-tank", owing to its expertise as well as its frequent communication with stakeholders in respective jurisdictions. Thus, we strongly encourage the Committee and its staffs to increase interaction with NSSs or the group of NSSs such as the Asian-Oceanian Standards Setters Group (AOSSG), to identify issues and devise the remedies in a timely fashion.</p>							
Ratings: 1 = strongly agree; 2 = agree; 3 = agree somewhat, but needs improvement; 4 = strongly disagree							
Leadership							
21.	Please rate the effectiveness of the Chair.						

IFRS Interpretations Committee Review

#	Criteria	Rating				Uncertain / Do not know	Not applicable
		1	2	3	4		
	(a) Discussions are at the appropriate level of detail.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	(b) Discussions are focused on the right issues.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	(c) Issues are identified and deliberated in a timely and effective manner.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments on Leadership</p> <p>While we are not sure of the leadership of the current Chair, as stated in the section of "Operating Procedures," we encourage the Trustees and the Committee to consider changing the current structure of the Committee. In so doing, we think it advisable to consider that the IASB member(s) chair the respective task force(s) according to respective expertise, so that the IFRS Foundation as a whole can make the best use of the extant resource both in terms of effectiveness and efficiency. In addition, it will reinforce the linkage between the IASB and the Committee, which will facilitate the practical consideration by the IASB in its standards setting process.</p>							
<p>Ratings: 1 = strongly agree; 2 = agree; 3 = agree somewhat, but needs improvement; 4 = strongly disagree</p>							
<p>Interaction with the IASB</p> <p>The designated Board observers are (from July 2010) Philippe Danjou, Amaro Gomes, Patricia McConnell and Wei-Guo Zhang . They are encouraged primarily to listen and to provide Board Member perspectives on issues being discussed rather than participate in the debate. The Director of Implementation Activities provides an oral update to the IASB after each Interpretations Committee meeting.</p>							
22.	The Committee interfaces effectively with the IASB	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
23.	The IASB responds effectively to the IFRS Interpretations Committee's recommendations	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Ratings: 1 = strongly agree; 2 = agree; 3 = agree somewhat, but needs improvement; 4 = strongly disagree</p>							



IFRS Interpretations Committee Review

Comments on Interaction with the IASB

We do not think it appropriate that the Board members just observe the Committee meeting. Please see our comments in the section "Leadership."

Overall evaluation

24. Overall, the Committee is achieving its stated objectives and scope of activities.

Ratings: 1 = strongly agree; 2 = agree; 3 = agree somewhat, but needs improvement; 4 = strongly disagree



IFRS Interpretations Committee Review

<p>Comments: Please list the three aspects of Committee's activities that, in your opinion, are working best.</p>
<p>Please list the three aspects of Committee's activities that, in your opinion, are in the most need of improvement.</p>
<p>Do you have any suggestions on improving the process of assessing the Interpretations Committee?</p>
<p>General comments: use this space for any general comments that you may have.</p>