



July 30, 2008

Peter Martin, CA
Director, Accounting Standards
Accounting Standards Board
277 Wellington Street West
Toronto, Ontario M5V 3H2

Dear Peter:

Re: Exposure Draft – Adopting IFRSs in Canada, April 2008

The Committee on Corporate Reporting of Financial Executives International Canada (“FEI Canada”) is writing to provide its response to the Accounting Standards Board (“AcSB”) April 2008 Exposure Draft – Adopting IFRSs in Canada.

FEI Canada is an all-industry professional association of senior financial executives, with eleven chapters across Canada and more than 2,100 members. FEI Canada provides thought leadership and advocacy services to its members.

The Committee on Corporate Reporting (“CCR”) is one of two national advocacy committees of FEI Canada. CCR comprises more than 20 senior financial executives representing a broad cross-section of the FEI membership and of the Canadian economy who have volunteered their time, experience and knowledge to consider and recommend action on a range of issues related to accounting, corporate reporting and disclosure. In addition to advocacy, CCR is devoted to improving the awareness and educational implications of the issues it addresses, and is focused on continually improving the standards and regulations impacting corporate reporting.

Question 1

Do you agree with the AcSB's proposals regarding the entities to which IFRSs will, or will not, apply after the changeover date?

We support the proposals regarding the entities to which IFRSs will apply after the changeover date, including the exception that “pension plans continue to prepare their financial statements in accordance with PENSION PLANS, Section 4100, rather than IAS 26, Accounting and Reporting by Retirement Benefit Plans.”

Question 2

The standards and interpretations included in this Exposure Draft have been developed by the IASB for universal application. Do you think that, regardless of this fact, one or more of these standards and interpretations contain requirements that would lead to inappropriate results if they were applied in Canada?

We are aware of specific issues within the Oil & Gas and Rate Regulated industries and support the current efforts to address these issues with the IASB. We would be happy to provide assistance by working with the AcSB to resolve the issues with the IASB.

We are not aware of any other standards or interpretation included in the Exposure Draft that would lead to inappropriate results if applied in Canada. We support the AcSB's intention that when IFRSs are adopted in Canada, they are adopted in full and without modification.

Question 3

In general, the AcSB will not issue application or interpretative guidance on IASB standards. Do you think that such guidance is necessary for any of the IFRSs being exposed, even though it appears unnecessary elsewhere in the world?

We do not believe that any Canadian-specific guidance should be issued on IASB standards. We support the goal of global convergence of financial reporting standards, and believe that the issuance of Canadian-specific guidance (on or after changeover date) would be contrary to that objective.

We are supportive of International Financial Reporting Interpretations Committee examining the issues with respect to entities subject to rate regulation.

Question 4

Can you identify current guidance that is necessary in Canada after the changeover date, even when it appears not to be needed elsewhere in the world?

We believe it would be inappropriate to issue Canadian-specific guidance on IASB standards, and that every effort should be made to address any Canadian issues through

the IASB. We agree with the final decisions of the EIC Abstracts Review Task Force as issued in May 2008.

Question 5

Are amendments to IFRS 1 needed to provide special transitional provisions for the adoption by Canadian entities of any of the IFRSs being exposed?

We support the AcSB's request to the IASB for amendments to IFRS 1, as well as those submitted by the Canadian Oil & Gas Industry Oversight Committee. We are not aware of any other issues that would require amendments to IFRS 1.

Question 6

Does the possibility of voluntary early adoption of IFRSs by Canadian entities raise issues that you think the AcSB should be aware of?

We believe that early adoption of IFRS may be beneficial to some Canadian entities, specifically those already preparing IFRS information for an international parent company, SEC registrants wishing to avoid reconciliation to US GAAP, or those who compete for capital with other entities who have already adopted IFRS. We acknowledge this would result in Financial Statements prepared under different standards, however this would be for a relatively short period of time and believe that only a small number of Canadian entities will elect early adoption.

We believe that Canadian entities considering early adoption should carefully consider all the implications of a transition to IFRS to ensure they are appropriately prepared to produce quality financial reporting on a timely basis and that users of such financial statements understand the changes.

Question 7

Do you agree that Canadian entities should not be required to provide the disclosures required by paragraph 1506.30 for the IFRSs exposed in this Exposure Draft and any other IFRSs incorporated into the Handbook in advance of the changeover date? If so, do you agree that the AcSB's proposed changes to Section 1506 achieve the desired result? (See "Disclosures about IFRSs not yet effective in Canada" above.)

We agree that Canadian entities should not be required to provide the full disclosure required by paragraph 1506.30 for any IFRS incorporated into the Handbook in advance of the changeover date.

The Committee on Corporate Reporting (CCR) is pleased to have the opportunity to provide our views on this topic and trusts that you find our comments constructive. We would be happy to discuss our comments with you at any time.

Yours very truly

A handwritten signature in black ink, appearing to read "Victor Wells", written in a cursive style.

Victor Wells

Chair
Committee on Corporate Reporting
FEI Canada