

July 25, 2011

Mr. Tom Seidenstein
Chief Operating Officer
IFRS Foundation
30 Cannon Street
London, EC4M 6XH
United Kingdom

Email: strategyreview-comm@ifrs.org

Dear Mr. Seidenstein:

The Committee on Corporate Reporting (CCR) of Financial Executives International Canada (FEI Canada) is pleased to provide its comments on the Report of the Trustees Strategy Review entitled *IFRSs as the Global Standard: Setting a Strategy for the Foundation's Second Decade*.

FEI Canada is the all-industry professional membership association for senior financial executives. With eleven chapters across Canada and more than 2,000 members, FEI Canada provides professional development, thought leadership and advocacy services to its members. The association membership, which consists of chief financial officers, audit committee directors and senior executives in the finance, controller, treasury and taxation functions, represents a significant number of Canada's leading and most influential corporations.

The Committee on Corporate Reporting (CCR) is one of two national advocacy committees of FEI Canada. CCR comprises more than 25 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.

CCR generally agrees with the overall strategy and the four areas of focus as presented in the Report. We do have observations with respect to certain of the more detailed considerations for each of the areas of focus. These are noted below and are referenced to the sections as numbered in the Report. We reference only those sections on which we have a comment.

Serving the public interest through financial reporting standards

A1

CCR believes that the first objective of the IASB (Board) must be to set the highest quality general purpose financial reporting standards for use in the global marketplace. We agree that the Board's focus in setting these standards should be to ensure the efficient operation of global capital markets and that ensuring financial reporting transparency and integrity is key to sustaining the confidence of users in financial statements.

A2

CCR agree with the Foundation's goal of global adoption of IFRS as developed by the IASB in their entirety and without modification as a requisite for a jurisdiction to claim it has adopted IFRS. However, CCR disagrees that entities within jurisdictions should be prevented from asserting full adoption of IFRS as developed by IASB when those entities are in full compliance regardless of the status of the jurisdiction.

A4

CCR agree that the IASB should focus its work on developing standards for private sector entities and not be distracted by considering issues such as sustainability reporting.

A5

Ensuring consistent application of IFRSs globally is an important objective of the IASB. In A5, we note that "the IASB, in partnership with relevant authorities, will identify jurisdictions where IFRSs are being modified and encourage transparent reporting of such divergence'. This is described as role of the Trustees in A3. We recommend that only one group have this responsibility to ensure clear accountability and avoid duplication of effort.

CCR does not agree that high quality XBRL taxonomy is needed to ensure comparability of financial data. Clear, understandable standards coupled with consistent interpretation and application ensures comparability.

CCR believes that post-implementation reviews should be part of the process in ensuring consistent application of standards. In our view, the review should cover the application of the entire standard across countries and industries to ensure consistency.

B2

CCR believes that the existing three-tier structure of governance is sufficient and appropriate.

B3

CCR agree with enhancing the role of the Due Process Oversight Committee to ensure the Committee review. A review of the expe reviews the status of the IASB's due process on major projects against an agreed framework.

C1

CCR agree and support a commitment to continued improvement in the IFRS Foundation and IASB due processes.

C3

CCR encourage the Trustees to develop an agreed methodology for field visits/tests and effects analyses. Field testing should include consideration of the impact and ease or difficulty in implementing a new standard by assessing both information technology and business process requirements.

C4

CCR agree that post-implementation reviews should be undertaken to identify implementation issues. To ensure consistent implementation, the application of the entire standard should be included in the post-implementation cted costs and implementation issues should be undertaken as part of the effects analyses so that changes to the standard can be made prior to it becoming effective.

D1

CCR agree that the funding system must maintain the independence of the standard-setting process.

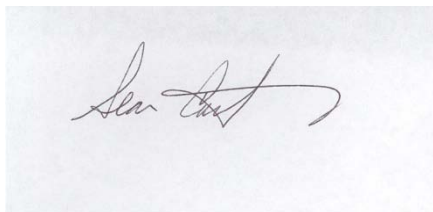
D2

CCR caution the Trustees on the use of differing funding mechanisms to avoid actual or perceived conflicts of interest. We believe the same funding principles should apply to all countries.

We hope the above comments are usefully to the Trustees as they continue their deliberations on the strategy.

Please do not hesitate to contact us should you have any questions,

Regards,



Sean Carleton
Chair, Committee on Corporate Reporting
FEI Canada