



April 7, 2011

IFRS Foundation Monitoring Board
c/o Mr. Takashi Nagaoka
Director for International Accounting
Financial Services Agency of Japan
Email: t-nagaoka@fsa.go.jp

And

c/o Mr. Makoto Sonoda
Deputy Director, Corporate Accounting and Disclosure Division
Financial Services Agency of Japan
Email: makoto.sonoda@fas.go.jp

Response to the Consultative Report on the Review of the IFRS Foundation's Governance

Dear Sirs:

The Committee on Corporate Reporting (CCR) of Financial Executives International Canada (FEI Canada) is responding to your request for views on the "Consultative Report on the Review of the IFRS Foundation's Governance issued on February 7, 2011 ("the Consultative Report").

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.

CCR is one of two national advocacy committees of FEI Canada. 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 has read and concurs with the views of the Canadian Accounting Standards Oversight Council (AcSOC) expressed in a letter to you dated March 29, 2011 and we will not repeat those views in this letter.

There are, however, two matters on which we do wish to state our views because we believe they are critical to the ongoing credibility of the IASB in the global standard-setting

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environment; namely the proposals that the Monitoring Board have the ability to place items on the IASB's agenda and changes to the Monitoring Board's role in the selection of the chair of the IASB.

CCR strongly disagrees that the Monitoring Board should have any authority to place an item on the IASB's agenda. This would go far beyond the role of the Monitoring Board and would do irreparable harm to the independence of the IASB, which must have the responsibility and accountability for setting its technical agenda. The IASB has a consultative process through which it receives views on the technical agenda and the Monitoring Board is able to provide its views on the agenda to the Trustees. This is appropriate and the Monitoring Board should not have a special role in the process.

We also strongly disagree that the Monitoring Board should have any expanded role with respect to the selection of the IASB Chair. This responsibility lies with the Trustees and any intrusion by the Monitoring Board into the process would, in the view of CCR, impair the independence of the IASB.

CCR appreciates the opportunity to comment on the Consultative Report and we trust that our comments will be of use to you as you continue your deliberations. Please do not hesitate to contact us if you would like to discuss our views further.

Regards,



Tyrone Cotie
Chair
Committee on Corporate Reporting
FEI Canada

Cc Denis Desautels, Chair, AcSOC