



June 16, 2014

International Accounting Standards Board
30 Cannon Street
London, United Kingdom
EC4M 6XH

Reply sent by e mail

RE: Exposure Draft *Disclosure Initiative* (Proposed Amendments to IAS 1)

Dear Sirs and Mesdames:

The Committee on Corporate Reporting (CCR) of Financial Executives International Canada (FEI Canada) is responding to your request for comments on the Exposure Draft *Disclosure Initiative* (Proposed Amendments to IAS 1).

CCR is one of seven thought leadership committees of FEI Canada. CCR is devoted to improving the awareness of issues and educating FEI Canada members on the implications of the issues it addresses, and is focused on continually improving the standards and regulations impacting corporate reporting.

CCR believes that note disclosures today are often excessive and, as a result, include information that is not useful. This, in turn, makes it difficult to identify key information. Therefore, CCR strongly supports any efforts that lead to increased relevancy of financial statement notes.

Consistent with this overall view, CCR strongly supports the proposed changes to IAS 1. All of the proposed narrow scope amendments clarify the use of materiality and judgement when preparing the financial statements and notes thereto.

However, CCR believes that these amendments may have very little impact in Canada. Many other factors influence decisions on note format and content, including the views of auditors, legal counsel and regulators. Many companies elect to take the path of least resistance, not wanting to spend the time discussing whether information is material or whether a new/different note display meets the "rules". That being said, the proposed changes to IAS 1 allow the debate to occur. We encourage the IASB to continue with the other aspects of its Disclosure Initiative and to work with IOSCO, the IAASB, users and others to accomplish an overall culture change with respect to note disclosure that encourages relevancy and usefulness.

We also agree with the proposal for presentation of items of other comprehensive income arising from equity-owned investments and the proposed transition provisions.

We have no detailed comments to make on the changes to the wording in the standard.

Regards,



Gordon Heard
Chair
Committee on Corporate Reporting
FEI Canada

Financial Executives International Canada (FEI Canada) is the all industry professional membership association for senior financial executives. With eleven chapters across Canada and more than 1,700 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. www.feicanada.org