



Response to FRC FRED 53:
Draft Amendments to FRS 101
Reduced Disclosure Framework (2013/2014)

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INTRODUCTION

ICAS welcomes the opportunity to comment on the FRED 53: Draft amendments to FRS 101 *Reduced Disclosure Framework* (2013/14).

The ICAS Charter requires its committees to act primarily in the public interest, and our responses to consultations are therefore intended to place the public interest first. Our Charter also requires us to represent our members' views and to protect their interests, but in the rare cases where these are at odds with the public interest, it is the public interest which must be paramount.

The ICAS Accounting Standards Committee has considered the Exposure Draft and I am pleased to forward their comments.

Any enquiries should be addressed to Amy Hutchinson, Assistant Director, Technical Policy.

RESPONSE TO THE EXPOSURE DRAFT

Question 1

Do you agree with the proposed amendments to the FRS 101 *Reduced Disclosure Framework*? If not, why not?

Response:

We agree with the proposed amendment to Paragraphs 4A, 6 and 8(l). We understand that proposed paragraphs AG1(gA) and AG1 (gB) are being inserted into the application guidance to FRS 101 in order to align IFRS 10 with the Companies Act, however we are not convinced that this amendment is strictly necessary. IFRS 10 relates to consolidated financial statements, while FRS 101 may only be applied to an entity's separate financial statements. Therefore the investment entity amendments do not apply directly to FRS 101 accounts – we think perhaps some further wording is required to clarify why this amendment has been made.

Question 2

Do you agree with the proposed effective date? If not, why not?

Response:

We agree that the effective date of the amendments should be the same as the effective date of FRS 101.