

IFRS Foundation
30 Cannon Street
London
EC4M 6XH

Our Ref: TECH-CDR-1000

30 November 2010

Dear Sirs

Annual improvements: due process handbook of the IASB

ACCA (Association of Chartered Certified Accountants) is pleased to have this opportunity to comment on the above consultation document which was considered by ACCA's Financial Reporting Committee and I am writing to give you their views.

In considering the annual improvements it is undesirable for there to be too many amendments to the standards and so IASB should consider carefully whether any proposed amendment is needed.

The boundary between what could be in the annual improvement process and what could be an interpretation is not very distinct. However we are not concerned by this as long as both are subject to due process consultation and to approval by the IASB.

We support the amendments proposed.

If there are any matters arising from the above please be in touch with me.

Yours sincerely

A handwritten signature in black ink, appearing to read "R Martin".

Richard Martin
Head of financial reporting