

September 28, 2015

[commentletters@ifrs.org](mailto:commentletters@ifrs.org)

IFRS Foundation  
30 Cannon Street  
London EC4M 6XH  
United Kingdom

**Ref: ED 2015/4 – Updating references to the Conceptual Framework**

Dear Board Members,

The Comitê de Pronunciamentos Contábeis - CPC (Brazilian Accounting Pronouncements Committee)<sup>1</sup> welcomes the opportunity to respond to this exposure draft.

We are a standard-setting body engaged in the study, development and issuance of accounting standards, interpretations and guidance for Brazilian companies.

Our detailed responses to the specific questions posed in the ED 2015/4 – Updating references to the Conceptual Framework are set forth in the following pages.

If you have any questions about our comments, please do not hesitate to contact us at [operacoes@cpc.org.br](mailto:operacoes@cpc.org.br).

Yours sincerely,



Silvio Takahashi  
Chair of International Affairs  
Comitê de Pronunciamentos Contábeis (CPC)

---

1

The Brazilian Accounting Pronouncements Committee (CPC) is a standard-setting body engaged in the study, development and issuance of accounting standards, interpretations and guidances for Brazilian companies. Our members are nominated by the following entities: ABRASCA (Brazilian Listed Companies Association), APIMEC (National Association of Capital Market Investment Professionals and Analysts), BMFBOVESPA (Brazilian Stock Exchange and Mercantile & Future Exchange), CFC (Federal Accounting Council), FIPECAFI (Financial and Accounting Research Institute Foundation) and IBRACON (Brazilian Institute of Independent Auditors).



### **Question 1—Replacing references to the Conceptual Framework**

The IASB proposes to amend IFRS 2, IFRS 3, IFRS 4, IFRS 6, IAS 1, IAS 8, IAS 34, SIC-27 and SIC-32 so that they will refer to the revised Conceptual Framework once it becomes effective.

Do you agree with the proposed amendments? Why or why not?

#### **Answer to question (1):**

We have analyzed the amendments to the following standards and are in accordance with all.

- IFRS 2 share-based payment
- IFRS 3 business combinations
- IFRS 4 insurance contracts
- IFRS 6 exploration for and evaluation of mineral resources
- IAS 1 presentation of financial statements
- IAS 8 accounting policies, changes in accounting estimates and errors
- IAS 34 interim financial reporting
- SIC-27 evaluating the substance of transactions involving the legal form of a lease
- SIC-32 intangible assets—web site costs

We consider that these amendments will have minor impact in our jurisdiction.

### **Question 2—Effective date and transition**

The IASB proposes that:

(a) a transition period of approximately 18 months should be set for the proposed amendments. Early application should be permitted.

(b) the amendments should be applied retrospectively in accordance with IAS 8, except for the amendments to IFRS 3. Entities should apply the amendments to IFRS 3 prospectively, thereby avoiding the need to restate previous business combinations.

Do you agree with the proposed transition provisions and effective date? Why or why not?

#### **Answer to question (2):**

We agree with the transition provisions and the effective date.



**Question 3—Other comments**

Do you have any other comments on the proposals?

**Answer to question (3):**

We respectfully request that the board access our comments in the Exposure Draft on Conceptual Framework and seek to complete analyze the impacts of the exchange in other standards. We enhance our position that the board should seek to identify any distortions from the new [draft] Conceptual Framework and adjust the other standards as soon as possible. We kindly request the board to notify in the Basis for Conclusion any other comments received during the exposure draft and outreach assignments.