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10 January 2012

International Accounting Standards Board
1st Floor 30 Cannon Street
London EC4M 6XH
United Kingdom

(By email: CommentLetters@iasb.org)

Dear Sirs,

RESPONSE TO EXPOSURE DRAFT – GOVERNMENT LOANS (PROPOSED AMENDMENTS TO IFRS 1)

The Institute of Certified Public Accountants of Singapore (ICPAS) appreciates the opportunity to comment on the above exposure draft (ED) issued by the International Accounting Standards Board (IASB) in October 2011.

Our comments on the specific questions in the ED are as follows:

Question 1:

The Board proposes to amend IFRS 1 so that first-time adopters would be required to apply paragraph 10A of IAS 20 prospectively to loans entered into on or after the date of transition to IFRSs, unless the information needed to apply these requirements to a government loan as a result of past transaction was obtained at the time of initially accounting for that loan.

Do you agree? Why or why not?

We agree to the proposal which will ease the burden on the first-time adopters. We also concur with the reasons provided by the Board in the Basis for Conclusions for proposing the exception to the retrospective application of the IFRSs.

Question 2:

Do you have any other comments on the proposals?

We have no further comments.

Should you require any further clarification, please feel free to contact Ms Chia Shini, Technical Assistant Manager, from ICPAS via email at shini.chia@icpas.org.sg.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'TKP', with a horizontal line extending to the right.

Dr Tham Kah Poh, FCPA
Chief Executive Officer