



## สภาวิชาชีพบัญชี ในพระบรมราชูปถัมภ์

FEDERATION OF ACCOUNTING PROFESSIONS  
UNDER THE ROYAL PATRONAGE OF HIS MAJESTY THE KING

Mr. Hans Hoogervorst  
Chairman  
International Accounting Standards Board (IASB)  
30 Cannon Street  
London EC4M 6XH  
United Kingdom

August 27, 2016

Dear Mr. Hoogervorst,

### **Comment Letter on Exposure Draft Trustees' Review of Structure and Effectiveness: Proposed Amendments to the IFRS Foundation Constitution**

The Federation of Accounting Professions of Thailand would like to show our appreciation on the opportunity to comment on **Exposure Draft Trustees' Review of Structure and Effectiveness: Proposed Amendments to the IFRS Foundation Constitution**. Overall, we agree and support the main proposed changes and believe that it will enhance the effectiveness of the Constitution. Nevertheless, we draw attention to the use of 'at large' Trustee appointments and the reduction in the board's number. These issues should be carefully treated.

Please find our responses to the specific questions raised in **Exposure Draft Trustees' Review of Structure and Effectiveness: Proposed Amendments to the IFRS Foundation Constitution** in an attachment. We believe that this proposed amendment will help the practitioners in the future and that our comment letter will contribute positively to the IASB's due process. Should you need more information, please kindly contact the Federation of Accounting Professions of Thailand.

The Federation of Accounting Professions avails itself of this opportunity to the International Accounting Standards Board the assurances of its highest consideration.

Yours sincerely,

Associate Professor Dr. Vorasak Tummanond  
Chair of Thai Accounting Standards Board  
Federation of Accounting Professions of Thailand  
Bangkok, Thailand

Copied to:

- 1) Chairman, Accounting Standard-Setting Committee of Thailand
- 2) Chairman, Subcommittee on Studying and Monitoring of International Financial Reporting Standards
- 3) President, Federation of Accounting Professions of Thailand



**Exposure Draft Trustees' Review of Structure and Effectiveness: Proposed Amendments to the IFRS Foundation Constitution**

---

In overall, we agree and support the Trustee's proposed changes to the Constitution on the professional background, the remuneration of the Trustees, the size and voting requirements of the board. We have no objection with the proposal to clearly state that the required review is to commence, at the latest, five years after the previous review has been completed. This is mainly because we appreciate the flexibility that it allows Trustees to initiate a review less than five years after the last one if such a review is needed. We also agree with the proposal on the terms of reappointment of the Board because the longer term of IASB members, the better continuity of major projects. We agree with the proposal for the Advisory Council to normally meet at least two times a year as its role in recent years has become more strategic.

In term of the overall geographical distribution of Trustees component, we agree that the Trustee component should base on global capital market proportion and diversity of geographical and professional backgrounds. Also, we agree with the proposal to retain the category of 'at large' Trustee appointments which increase the number from two to three members. However, to promote transparency, the guidelines regarding 'at large' appointments shall have well-defined procedures with limited judgement involved, and be subject to public hearings. In addition, concrete roadmap to IFRS adoption could be one of criteria of 'at large' appointments since views and opinions of that particular jurisdiction will definitely be beneficial to achieve IFRS Foundation's vision of supporting and promoting IFRS adoption around the world.

With respect to the fact of current fourteen board members, we do not object the proposal to reduce the size of the board to thirteen members with one optional 'at large' member. However, we encourage the Trustee to consider whether the reduction in the size of the board will continue to be appropriate and effectively support the accounting development in the future or not. In term of the board's capabilities and practical experiences, we would like to emphasize that the board members should come from a wide range of various business backgrounds and aspects in order to facilitate the development of accounting standards that is useful, and in line with the real business practice.