

11 April 2018

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

Dear Sir,

COMMENTS ON THE INTERNATIONAL ACCOUNTING STANDARDS BOARD'S EXPOSURE DRAFT ED/2017/5

We would like to take this opportunity to provide our comments on Exposure Draft (ED) ED/2017/5 *Accounting Policies and Accounting Estimates (Proposed Amendments to IAS 8)* issued by the International Accounting Standards Board (IASB).

2. In this ED, the IASB replaced the definition of '*a change in accounting estimate*' with a definition of '*accounting estimates*' in IAS 8 *Accounting Policies, Changes in Accounting Estimates and Errors*. Under the proposed definition, judgements made in applying an accounting policy are accounting estimates if they are made when, *because of estimation uncertainty*, an item cannot be measured with precision.

3. We would like to highlight that the phrase '*because of estimation uncertainty*' is unnecessary because in the first place, estimations are used because of uncertainty. We would like to suggest to the IASB to remove the phrase '*because of estimation uncertainty*' from the proposed definition.

Accounting estimates are judgements or assumptions used in applying an accounting policy when, ~~because of estimation uncertainty~~, an item in financial statements cannot be measured with precision.

4. We hope that our comments will contribute to IASB's further deliberation on this ED. If you require any clarifications, please contact the Secretariat, Advisory Committee on Accounting Standards for Statutory Boards. Thank you.



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Yours sincerely

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