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Accounting Standards Board
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Submitted by email to: asbcommentletters@frc-asb.org.uk

Archer Daniels Midland Company (ADM) is one of the world's largest agricultural processing companies, with more than \$81 billion in annual revenues and employing more than 30,000 people globally. ADM is a large accelerated U.S. SEC filer, and its stock is listed on the New York and Frankfurt stock exchanges. ADM helps connect the harvest to the home in more than 160 countries and has a significant presence in the UK with more than 1,100 employees. Our operations in the UK and Ireland span from full-service investment brokerage services to the manufacturing of products ranging from vegetable oil to flour to chocolate.

ADM appreciates the opportunity to comment on the ASB's Revised Financial Reporting Exposure Drafts. We provided comments on the earlier financial reporting exposure drafts in April 2011 and would like to reiterate in this letter our support for the revised proposals. With 27 subsidiaries currently applying UK GAAP, ADM has a keen interest in ensuring that changes to UK GAAP improve the reporting framework for global companies.

ADM agrees with the ASB's objective "to enable users of accounts to receive high-quality, understandable financial reporting, proportionate to the size and complexity of the entity and the users' information needs". We support the significant change between FRED 43 and FRED 46, eliminating the concept of public accountability, which would have required all entities with public accountability to apply EU-adopted IFRS. ADM also supports the application of EU-adopted IFRS not being extended beyond the requirements of the EU's IAS Regulation, and at the same time qualifying entities being given the option to adopt IFRS with reduced disclosure options.

We believe the ability to use IFRS with the reduced disclosure framework alleviates many IFRS reporting challenges, while retaining the benefit of a consistent accounting platform. Our entities in the UK and Republic of Ireland plan to apply IFRS with reduced disclosures rather than use draft FRS 102. Using IFRS for recognition and measurement will help reduce the burden on our global financial reporting resources of applying multiple local GAAPs. The reduced disclosure framework will reduce disclosure requirements and therefore costs. We strongly support the change to include related party transactions on the list of disclosure exemptions in the revised proposal. In addition, ADM supports the principles that will provide structure in determining which disclosures should be reduced as new IFRS are introduced.

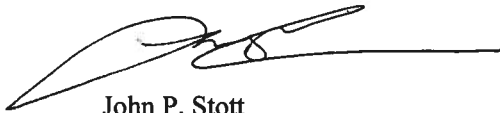
ADM can support the proposed effective date. However, as U.S. subsidiaries, it will be more desirable for us if the effective date of the proposals is lined up with the timeline of U.S. conversion to IFRS.

We believe further clarification is needed on the proposal whereby exemptions from disclosure requirements are permitted when equivalent disclosures are included in the consolidated financial statements of the group in which the entity is consolidated. We would like to see language in the final standard stating that, for the purpose of equivalent disclosures, US GAAP is found to be equivalent. This will alleviate the need to perform a costly and burdensome exercise evaluating the effect of disclosure differences between US GAAP and EU-adopted IFRS.

In conjunction with this letter, ADM has also written to the Department for Business, Innovation & Skills (BIS) regarding the Company Law theme under the Red Tape Challenge programme. To ensure that the Company Law framework is as efficient as possible, ADM urges BIS to find solutions to better align the Company Act Accounts format with IAS accounts presentation format. As proposed in the exposure draft, the individual accounts that are prepared by a company applying EU-adopted IFRS with reduced disclosures are Companies Act accounts, whereas individual accounts that are prepared applying EU-adopted IFRS are IAS accounts. The accounts format under the Companies Act has not evolved in line with global accounting standards, resulting in additional cost and burden to trace and map accounts from the global reporting framework used for parent company reporting to the Companies Act framework. A consistent reporting presentation framework would be more cost-efficient for global companies like ADM as we can gain synergies from standardized processes, procedures and financial reporting information systems.

We appreciate the opportunity to provide our comments and would be pleased to discuss our views.

Sincerely,

A handwritten signature in black ink, appearing to read 'John P. Stott', with a long horizontal line extending to the right.

John P. Stott
Vice President and Controller