

EFRAG Technical Expert Group
41, Avenue des Arts
B-1040 Brussels
Belgique

Our ref : AdK
Date : 22 April 2008
Re : Comments on your draft comment letter on IFRIC's Exposure Draft of a proposed interpretation on Distributions of Non-cash Assets to Owners

Dear members of the EFRAG Technical Expert Group,

The Dutch Accounting Standards Board (DASB) appreciates the opportunity to respond on your draft comment on IFRIC's Exposure Draft of a proposed interpretation on Distributions of Non-cash Assets to Owners.

Our main concern is that the topic of the draft interpretation is not in the scope of any of the current IFRS standards. A dividend payable is clearly neither a provision nor a contingent liability, and therefore not in the scope of IAS 37.

Therefore, if this issue will be addressed within IFRS, we prefer it should be included in a specific IFRS standard, instead of an interpretation of current standards. This specific IFRS standard might also address related issues, such as the accounting for demergers, and the accounting for stock dividends.

On a stand-alone basis, we consider the issue of distributions of non-cash assets to owners within the limited scope of the proposed interpretation as too exceptional to justify a specific interpretation or standard.

Our main conclusion is that we think that this draft interpretation should not be issued.

Yours sincerely,



Hans de Munnik
Chairman DASB