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Our ref **MT/288**

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Contact **Mary Tokar**

27 April 2009

Dear Sir or Madam

Adoption of amendments to IFRIC 9 and IAS 39 – *Embedded Derivatives*

We appreciate the opportunity to comment on the European Financial Reporting Advisory Group's (EFRAG) draft endorsement advice regarding the International Accounting Standards Board's (IASB) amendments to IFRIC 9 and IAS 39 *Embedded Derivatives* (amendments), which were published by the IASB on 12 March 2009. This letter expresses the views of the international network of KPMG member firms.

We have read and considered the amendments and EFRAG's draft endorsement advice on the amendments in which EFRAG considers the requirements of the Regulation (EC) No. 1606/2002 of the European Parliament and of the Council on the application of International Accounting Standards. Our consideration focused on EFRAG's conclusion and in this response we are not addressing any points raised by EFRAG in Appendix 2 and 3 of its invitation to comment.

We provided comments to the IASB on the Exposure Draft *Embedded Derivatives – Proposed amendments to IFRIC 9 and IAS 39* (ED) in our comment letter dated 21 January 2009. We have followed the IASB's redeliberations on the comment letters on the ED and while not all of our suggestions were adopted by the IASB we do not believe that those comments, which were input to the Board's deliberations, represent fatal flaws that would cause us to recommend non-endorsement.

We support consistent application of International Financial Reporting Standards (IFRSs) globally and consistent with this objective we support EFRAG's recommendation to adopt for use in Europe the amendments as issued by the IASB.



Please contact Mary Tokar at +44 (20) 7694 8871 if you wish to discuss any of the issues raised in this letter.

Yours faithfully

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