



To: Michel Prada
Chairman
IFRS Foundation
30 Cannon Street
London
EC4M 6XH
United Kingdom

From: Economics & Finance department

Date: 17 December 2012

Reference: ECO-ACC-12-388

Subject: Invitation to Comment: Proposal to Establish an Accounting Standards Advisory Forum

Dear Mr Prada,

Insurance Europe welcomes the opportunity to respond to the invitation of the IFRS Foundation to comment on the "Proposal to Establish an Accounting Standards Advisory Forum" (ASAF). We are in favour of this initiative by the IFRS Foundation to formalise its current relationship with National Standard Setters (NSS) and 'other regional bodies' around the world. However, we are very concerned by the short timetable for commenting on the proposals, because of the potential due process implications.

We question the proposed composition and strongly believe that the countries/regions that have endorsed IFRS (or are committed to do so) should be given more weight in the discussion. We suggest that the exceptional contribution of EU-countries to the current global importance of the IFRS should be recognised. We support ASAF membership of the European standard setters and of EFRAG as an 'other regional body', particularly so as to reflect the diverse views of the many standard setters in Europe. We welcome the IASB acknowledgement of the need to continue its relationship with other bodies not directly represented in the ASAF, in order to utilise their specific regional/technical expertise.

Insurance Europe encourages the IASB to set up clear, robust and transparent criteria for the appointment of forum members. We believe that a fully transparent process will be an essential part of giving strong legitimacy to the ASAF, which we see as a forum for the exchange of views on technical matters. Accordingly, we do not support commitments 3 and 4 (supporting consistent IFRS application & best efforts to promote endorsement/adoption without modification over time of IFRS), which might be inconsistent with its role.

We furthermore support the view that the elected organisations should have the flexibility to organize themselves, rather membership being connected to individual persons. Furthermore, representatives should be allowed to be accompanied by one specialist or practitioner if in their assessment this is appropriate.



Finally, physical regular attendance of IASB members and IASB staff at ASAF meetings is of essential importance since the IFRS Foundation's Proposal does not require voting on the final ASAF statements. We support this approach as an attempt to encourage the free exchange of views at technical level. We consider this to be a main goal in the creation of the ASAF.

Please do not hesitate to contact us in case you have any questions or wish to discuss our comments.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Olav Jones", written over a horizontal line.

Olav Jones

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