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Our ref MT/288

Contact Mary Tokar

E-mail: [Commentletter@efrag.org](mailto:Commentletter@efrag.org)

18 February 2010

Dear Mr Enevoldsen

**Adoption of *Limited Exemption from Comparative IFRS 7 Disclosures for First-time Adopters – Amendment to IFRS 1***

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's) *Limited Exemption from Comparative IFRS 7 Disclosures for First-time Adopters – Amendment to IFRS 1* (the amendment), which was published by the IASB on 28 January 2010. This letter expresses the views of the international network of KPMG member firms.

We have read and considered the amendment and EFRAG's draft endorsement advice on the amendment in which EFRAG considers the requirements of 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 regarding the assessment of the amendment against the endorsement criteria and in this response we are not addressing any points raised by EFRAG in Appendices 2 and 3 of its invitation to comment.

We provided comments to the IASB on the exposure draft *Limited Exemption from Comparative IFRS 7 Disclosures for First-time Adopters – Proposed amendment to IFRS 1* (the exposure draft) in our comment letter dated 29 December 2009. We have followed the IASB's redeliberations on the comment letters on the exposure draft and while not all of our suggestions were adopted by the IASB we do not believe that those comments, which were input to the IASB's deliberations, represent fatal flaws that would cause us to recommend non-endorsement.

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



*KPMG IFRG Limited*  
*Adoption of Limited Exemption from Comparative IFRS 7 Disclosures for First-time Adopters –*  
*Amendment to IFRS 1*  
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Please contact Mary Tokar at +44 (20) 7694 8871 if you wish to discuss any of the issues raised in this letter.

Yours faithfully

*KPMG IFRG Limited*

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