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Ms. Françoise Flores
Chairman
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Our ref MT/288

Contact Mary Tokar

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6 January 2012

Dear Ms Flores

Adoption of Severe Hyperinflation and Removal of fixed dates for First-time Adopters (Amendments 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 (IASB) *Severe Hyperinflation and Removal of fixed dates for First-time Adopters* (Amendments to IFRS 1), which was published by the IASB on 20 December 2010. We have consulted within the KPMG network in respect of this letter, which represents the views of the KPMG network.

We have read and considered the amendments and EFRAG's draft endorsement advice on the Amendments to IFRS 1, 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 Amendments to IFRS 1, 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 both the ED 2010-10 *Removal of Fixed Dates for First-time Adopters* and the ED 2010-12 *Amendment to IFRS 1 Severe Hyperinflation* (the exposure drafts) in our comment letters dated 28 October 2010 and 30 November 2010, respectively. We have followed the IASB's redeliberations on the exposure drafts 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 Amendments to IFRS 1, as issued by the IASB.



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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

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