



International Accounting Standards Board
30 Cannon St.
LONDON, EC4M 6XH

17 January 2008

Dear Sir or Madam,

RE: PROPOSED AMENDMENTS TO IAS 39, EXPOSURES QUALIFYING FOR HEDGE ACCOUNTING

BUSINESSEUROPE very much welcomes the opportunity to comment on the above proposal. We are pleased to support the proposal as an improvement to the current standard. We would, however, like to suggest that you consider the following points where some clarification might further improve the amendment:

- We do not understand why changes in market price (e.g. of equity securities) appears to be excluded from the list of hedged items in paragraph 80Y. BUSINESSEUROPE strongly believes that this should be added.
- On transition there is some concern that retrospective may not be quite as straightforward in practice as BC 15 suggests where the changes in guidance imply the possibility of re-designation. We would like to suggest, to make implementation easier, that the possibility of re-designation is re-considered.

We remain at your disposal in case you would like to further discuss these issues.

Yours faithfully,

Jérôme P. Chauvin
Director
Legal Affairs Department
Internal Market Department