



Liberté • Égalité • Fraternité

RÉPUBLIQUE FRANÇAISE



Conseil National de la Comptabilité

3, Boulevard Diderot

75572 PARIS CEDEX 12

Téléphone 01 53 44 52 01

Télécopie 01 53 18 99 43/01 53 44 52 33

Internet <http://www.cnc.bercy.gouv.fr>

Mel jean-francois.lepetit@cnc.finances.gouv.fr

Le Président

JFL/EP

n° 512

Paris, September 26, 2008

Göran Tidström
Chairman Supervisory Board
EFRAG
13-14 Avenue des Arts
Brussels

Dear Göran,

Ref: Enhancement of EFRAG – Proposals for public Consultation

The Proposals for Public Consultation tend indisputably to reinforce the voice of Europe in the standard-setting process. They are well-timed, coming when the IASCF is presenting its views on changes in its constitution and making concrete proposals for increasing the accountability of the IASB.

The route which has been chosen is to improve the existing organisation; it is pragmatic and should enable the rapid creation of renewed institutions including, in particular, the Planning and Resource Committee (PRC) which we actively support.

The proposals reflect the equilibrium achieved by a year of discussions. However, we suggest the following improvements in order to bring even greater clarity to the organisation.

- It would not be illegitimate to better take into account the importance of the share of National Funding Mechanisms (NFM) in the funding of the EFRAG (2M € out of a total of 4,5M€ in the target scenario) in determining NFM representation in the Governance and Nominating Committee (GNC).
- The definition of the principle assignments of the PRC reflects the overall orientation of the reform and we are pleased with the corresponding role given to National Standard Setters (NSS). In order to reinforce the role and the place of the PRC, we suggest that the members coming from NSS, should be designated on the basis of the contributions which will be made to the NFM.
- Pro-active projects should without doubt be developed on a joint basis with the guidance of the PRC.

j:\sc\hierarch\lepetit\reponses\efrag\cnc - efrag - enhancement of efrag – proposals for public consultation.doc

- Lastly, the NSS should, according to a due process to be defined, be more directly involved in carrying out impact assessments and effects studies in order to make a contribution as close as possible to the preoccupations of preparers and auditors.

In conjunction with stakeholders, business and the accounting profession, we are striving to implement rapidly the arrangement which will enable France to contribute to the National Funding Mechanism and in this way to facilitate the realisation of the EFRAG + project. Obviously the financial requirements and proposed budget set out in the consultation document will need to be fully explained and justified ; stakeholders, issuers and auditors are naturally keen on having a detailed justification of funding contributions requested including details of the allocation of the funds.

We would like to be able to examine very shortly the amended version of texts (Statutes and Internal Rules) taking into account changes arising as a consequence of the proposals for consultation.

Best regards

A bientôt

A handwritten signature in black ink, appearing to read 'Jean-François Lepetit', with a long horizontal stroke extending to the right.

Jean-François LEPETIT